From: Strauss, Linda [Strauss.Linda@epa.gov]

Sent: 5/16/2019 8:09:25 PM

To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte

[Bertrand.Charlotte@epa.gov]

CC: Dunton, Cheryl [Dunton.Cheryl@epa.gov]

Subject: for awareness - doozy press Q's FW: LINDA: Questions on chemicals, deadline of noon Monday

Flag: Follow up

See below questions 1- 13. OPA already has answers to some of these questions (conflicts of interest); some are OLEM/ORD/OW's. I'm figuring who has lead on which ones now. I've told OPA to please press hard to get an extension. Linda 240-461-8231

From: Emily Holden < emily.holden@theguardian.com>

Sent: Thursday, May 16, 2019 3:35 PM

To: Press < Press@epa.gov>

Cc: Konkus, John < konkus.john@epa.gov>

Subject: Questions on chemicals, deadline of noon Monday

Hello,

I plan to write and publish a piece about industry lobbying against regulations on chemicals, including: trichloroethylene, formaldehyde and hexavalent chromium.

I would like to pose the following questions to EPA and make you aware of assertions made about the lobbying process by: outside experts, Americans impacted by chemical exposure, and campaigners who argue for increased regulations.

The deadline for me to include your response is **Noon ET on Monday, May 20**. If you have any questions, please call me at 225-284-8303.

As well, I ask that you please confirm receipt of this message, or I will note that you declined to comment.

Please see below.

Thank you, Emily

GENERAL QUESTIONS

- 1. While the EU bans or restricts more than a thousand chemicals, the US bans 11. What is EPA's comment on the discrepancy?
- 2. Can EPA comment on assertions that former industry officials now making decisions on chemical regulations at EPA have a conflict of interest? Nancy Beck worked for ACC, Erik Baptist worked for API, Peter Wright for Dow Chemical, David Dunlap for Koch Industries and Steven Cook for LyondellBasell Industries. They each work on chemicals at EPA. How do they avoid a conflict of interest?
- 3. Separately, one expert argues EPA is relying more on cellular-level studies (conducted in petri dishes) often developed in partnership with industry. She says EPA is doing this rather than using rodent studies. She calls it a "complete disaster." Can EPA comment?

TCE

- 4. Does EPA maintain TCE is <u>carcinogenic</u> to humans by all routes of exposure?
- 5. My reporting and research indicate the American Chemistry Council repeatedly requested EPA suspend 2014 guidelines for accelerated cleanup at TCE sites. EPA's Patrick Davis said no but that the agency might reconsider that decision as part of a different process. ACC later met with Kell Kelly. Does EPA have plans to relax this guidance?
- 6. ACC and the Halogenated Solvents Industry have argued the studies EPA relies on for TCE guidelines are not sound, including one linking heart malformations in utero to the chemical. Does EPA currently rely on that study? Is EPA reconsidering relying on that study?
- 7. Will EPA make any further decisions about whether to move forward with the Obama administration's proposed restrictions for certain uses of TCE?
- 8. What is EPA doing to help states address TCE plumes around the country?
- 9. Outside experts argue that EPA is using the updates to TSCA to <u>undermine ongoing</u> <u>reviews</u>. Can you comment?

FORMALDEHYDE

- 10. In a January 2018 letter, ACC criticized the agency's handling of formaldehyde rules. That summer, news broke that the government had been stalling the release of a report that most Americans inhale enough of the chemical to be at risk for leukemia. Did EPA advise withholding the study? Has ACC's criticism informed EPA's decisions around formaldehyde?
- 11. The letter was signed by ACC's Kimberly Wise White, who is now on EPA's science advisory board. Does Ms. White have to recuse herself from any activities she has previously lobbied the agency on?
- 12. Will the formaldehyde review be overseen by former ACC executive Nancy Beck? How will she avoid a conflict of interest?

HEXAVALENT CHROMIUM

13. In a recent science scoping meeting, ToxStrategies on behalf of ACC questioned a foundational study of cement workers that EPA relies on that connected the chemical to cancer. Will EPA continue to rely on this study?

--

Emily Holden

D.C.-based environment reporter Guardian News & Media

Mobile: +1 225 284 8303

(Also available on WhatsApp, Signal)
Email: emily.holden@theguardian.com

Twitter: @emilyhholden



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From: Hanley, Mary [Hanley.Mary@epa.gov]

Sent: 12/11/2017 8:35:18 PM

To: Dourson, Michael [dourson.michael@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@e

Subject: Comments from the Docket. FW: Section 6 NPRMs and related materials

Attachments: TCE-Vapor Degreasing.pdf; Paint removers-MC+NMP.pdf; TCE-Aersol Degreasing + Dry Cleaning.pdf; MC.WMBAR.Comment.pdf

MC.WMBAR.Exhibit_1_Center_for_Toxicology_and_Environmental_Health_(CTEH)_Comments_on_Health_Risk_Basis.pdf;

MC.WMBAR..Exhibit_2_Safety,_Science_Toxicology_Associates_Report_on_Data_Trends_(Redacted).pdf;

MC.WMBAR.Exhibit_4_Identification_and_Comparison_of_Solvents_and_Paint_Removers_as_Alternatives_to_Methylene_Chlor
MC.WMBAR.Exhibit_5_Identification_and_Comparison_of_Solvents_and_Paint_Removers_as_Alternatives_to_Methylene_Chlor
MC.WMBAR.Exhibit_6_Economic_Analysis_of_Proposed_TSCA_6_Action_on_Methylene_Chloride_(MECL2)_and_N-Methylpyrr
MC.WMBAR.Exhibit_9_2017_Market_Research_Report_on_Global_Paint_Remover_Industry.pdf; MC.WMBAR.Exhibit_10_(Exclusive)

MC.WMBAR.Exhibit_11_(Excluded)_W_M_Barr_Paint_Remover_Unit_Sales_Data_(2007_-_2016).pdf;

MC.WMBAR.Exhibit_13_(Excluded)_Paint_Strippers_-_Market_Share_by_Supplier_(2015).pdf; TCE Degreaser.ACA.pdf; TCE Deg

Flag: Flag for follow up

Mike,

Below are copies of the key comments for the two proposed rules for TCE and for MC and NMP. if you are interested in other's comments let me know. I have noted where materials are not available except through either the reading room or because they are CBI. If you would like me to get copies of the CBI documents please let me know.

Cheers

Mary

I. NPRM addressing use of TCE in dry cleaning and in aerosol spray degreasing

1. Halogenated Solvents Industry Alliance, Inc.

File is too large to share over the server. Please see this link to the comment in the docket: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0163-0176.

2. Dry Cleaning & Laundry Institute International:





TCE.DLI.pdf

TCE.DLI.2.pdf

II. NPRM addressing use of TCE in vapor degreasing - Comments

3. Halogenated Solvents Industry Alliance, Inc:



4. American Coatings Association:



III. NPRM addressing paint remover uses of MC and NMP - Comments

1. Comments from W.M.Barr & Company, Inc.:

Comments and Cover for Exhibits:

PEF

MC.WMBAR.Co...

MC.WMBAR.Co...

Exhibits 1, 2 & 4 (Note **Exhibit 3**, *Applied Safety Ergonomics Report on Labeling(Redacted)*, is available in the EPA Docket Reading Room 1301 Conn Ave, Rm 3334 because it contains copyright data.)

) PEF PSF

PI

MC.WMBAR.Exh...

MC.WMBAR..Ex...

MC.WMBAR.Exh...

Exhibits 5, 6 & 9 (Note **Exhibit 7**, *Exponent Flammability Report, EPA Paint & Coatings Remover Flammability Analysis*, is available in the EPA Docket Reading Room 1301 Conn Ave, Rm 3334 because it contains copyright data.)

DEF

J. Pos

J. P.DF

MC.WMBAR.Exh...

MC.WMBAR.Exh...

MC.WMBAR.Exh...

The following exhibits have been excluded because they contain TSCA CBI: Exhibits 10, ASTM Standard D 618 9-97, **Exhibit 11** .M .Barr Paint Remover Unit Sales Data(20 07 -20 16), & **Exhibit 13**, Paint Strippers-Market Share by Supplier(2015).

Note that Exhibit 12, Barr Updated Labels, is available in the Docket Reading room because it contains copyright data)

A. POF A. POF

A. PEF

MC.WMBAR.Exh...

MC.WMBAR.Exh... MC.WMBAR.Exh...

From: Hanley, Mary

Sent: Friday, December 08, 2017 2:25 PM

To: Michael Dourson (dourson.michael@epa.gov) < dourson.michael@epa.gov>; Beck, Nancy < beck.nancy@epa.gov>;

Bertrand, Charlotte <Bertrand.Charlotte@epa.gov> **Subject:** Section 6 NPRMs and related materials

Mike,

Attached are the manuscript PDFs of the TCE, MC and MNP proposed rules. I am also providing links to comments and supporting documents as handy reference. I will pull out the specific comments discussed this morning and get those to you as well.

• NPRM addressing use of TCE in dry cleaning and in aerosol spray degreasing



TCE-Aersol Degreasing + Dr...

- <u>Public Comments</u> (*TIP*: you can filter public comment results by document subtype to show, e.g., only company/organization comments)
- Supporting Documents (analyses etc.)
- NPRM addressing use of TCE in vapor degreasing



TCE-Vapor Degreasing.pdf

- Public Comments
- Supporting Documents
- NPRM addressing paint remover uses of MC and NMP



Paint removers-MC+N...

- Public Comments
- Supporting Documents

From: Hanley, Mary [Hanley.Mary@epa.gov]

Sent: 11/1/2017 9:43:19 PM

To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]

Subject: FW: TCE Briefing

Attachments: TCE_RA Overview_OPPT management_092017_v3.pptx; Supporting materials_Briefing DAA TCE RE_102417.docx;

Makris et al 2016 TCE TCA DCA.PDF

I believe you already have these materials so I wasn't printing again. Let me know if you don't and we can have them printed

From: Hanley, Mary

Sent: Wednesday, November 01, 2017 5:33 PM **To:** Marshall, Venus <Marshall.Venus@epa.gov> **Cc:** Williams, Shirel <williams.shirel@epa.gov>

Subject: FW: TCE Briefing

Miss Venus, could you print these Thursday morning for the folders please. thanks

From: Hanley, Mary

Sent: Wednesday, November 01, 2017 4:20 PM **To:** Williams, Shirel <<u>williams.shirel@epa.gov</u>>

Subject: FW: TCE Briefing

Miss Shirel,

Please print for today's folders

Thanks

From: Scheifele, Hans

Sent: Monday, October 30, 2017 5:03 PM **To:** Bolen, Derrick < bolen.derrick@epa.gov>

Cc: Hanley, Mary < Hanley. Mary@epa.gov>; Pierce, Alison < Pierce. Alison@epa.gov>

Subject: FW: TCE Briefing

Hi Derrick,

Change of plans. We spoke to Jeff and we would like to use the timeslot at 3:30pm this Thursday that is currently the "NMP Risk Evaluation" meeting to for the "TCE Risk Briefing" meeting request in Alison's note below. Can you please find a time to reschedule the NMP meeting to the week of 11/13 and use the timeslot at 3:30 this Thursday for the TCE meeting?

Thanks in advance, Hans

Hans Scheifele

Special Assistant
Office of Pollution Prevention and Toxics
1200 Pennsylvania Ave., NW
Washington, DC 20460
Voice (202) 564-3122

From: Pierce, Alison

Sent: Monday, October 30, 2017 11:31 AM **To:** Bolen, Derrick bolen.derrick@epa.gov

Cc: Hanley, Mary < Hanley. Mary@epa.gov>; Scheifele, Hans < Scheifele. Hans@epa.gov>

Subject: FW: TCE Briefing

Derrick -

Per conversation, here's the information on the TCE meeting that was cancelled and needs to be rescheduled.

Thanks for the assistance!

Alison

ALISON PIERCE

Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. Washington, DC 20460 USA

PIERCE.ALISON@EPA.GOV

202.564.2437

From: Pierce, Alison

Sent: Tuesday, October 24, 2017 3:17 PM
To: Hanley, Mary < Hanley. Mary@epa.gov >
Cc: Scheifele, Hans@epa.gov >

Subject: FW: TCE Briefing

Per your request – here's the TCE info again (and the materials that had been sent up previously).

-a

Title of Meeting	TCE Risk Evaluation	
Date	As soon as practicable	
Length	50 minutes	
Attendees	Jeff Morris*; Tanya Mottley; Tala Henry*; Stan Barone*; Iris Camacho; Nhan Nguyen; Yvette Selby-Mohamadu; Chris Brinkerhoff; Hans Scheifele; Mary Hanley; Maria Doa; Joel Wolf; Michael Dourson; Charlotte Bertrand CC: Alison Pierce; Mark Hartman	
POC for Meeting	Hans Scheifele	
Materials		

ALISON PIERCE

Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. Washington, DC 20460 USA

PIERCE.ALISON@EPA.GOV

202.564.2437

From: Hanley, Mary [Hanley.Mary@epa.gov]

Sent: 4/10/2018 5:28:59 PM

To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]

Subject: FW: 8 of 10 PF documents for Intra, Inter-Agency Review

Attachments: CCl4 Draft PF 04-09-18.docx; HBCD Problem Formulation DRAFT 040918 CLEAN.DOCX; TCE PF March

15_downloaded April 9 at 328 pm_clean.docx; 1-BP Problem Formulation Document_MASTER

COPY_Draft_CLEAN_Apr_09_2018.docx; 14-Dioxane Problem Formulation DRAFT 4.9.18 for review.docx; NMP PF_(4-10-18).docx; PERC_PF_Draft_Clean_4-9-18.docx; PV29 Final Draft Problem Formulation_4-9-18.docx

I have forwarded to Shirel for printing.

From: Blair, Susanna

Sent: Tuesday, April 10, 2018 12:32 PM

To: Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Morris, Jeff

<Morris.Jeff@epa.gov>; Mottley, Tanya <Mottley.Tanya@epa.gov>

Cc: Hanley, Mary < Hanley. Mary@epa.gov>; Scheifele, Hans < Scheifele. Hans@epa.gov>; Pierce, Alison

<Pierce.Alison@epa.gov>

Subject: 8 of 10 PF documents for Intra, Inter-Agency Review

Hello.

Please find attached 8 problem formulations for review prior to inter/intra agency review.

Thanks, Susanna

From: Blair, Susanna [Blair.Susanna@epa.gov]

Sent: 4/10/2018 4:31:53 PM

To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Morris, Jeff

[Morris.Jeff@epa.gov]; Mottley, Tanya [Mottley.Tanya@epa.gov]

CC: Hanley, Mary [Hanley.Mary@epa.gov]; Scheifele, Hans [Scheifele.Hans@epa.gov]; Pierce, Alison

[Pierce.Alison@epa.gov]

Subject: 8 of 10 PF documents for Intra, Inter-Agency Review

Attachments: CCl4 Draft PF_04-09-18.docx; HBCD Problem Formulation DRAFT 040918 CLEAN.DOCX; TCE PF_March

15_downloaded April 9 at 328 pm_clean.docx; 1-BP Problem Formulation Document_MASTER

COPY_Draft_CLEAN_Apr_09_2018.docx; 14-Dioxane Problem Formulation DRAFT 4.9.18 for review.docx; NMP PF_(4-10-18).docx; PERC_PF_Draft_Clean_4-9-18.docx; PV29 Final Draft Problem Formulation_4-9-18.docx

Hello,

Please find attached 8 problem formulations for review prior to inter/intra agency review.

Thanks, Susanna

From: Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]

Sent: 8/22/2017 4:16:58 PM

To: Henry, Tala [Henry.Tala@epa.gov]
CC: Blair, Susanna [Blair.Susanna@epa.gov]

Subject: Re: TCE

Thanks!

Nancy B. Beck, Ph.D., DABT Deputy Assistant Administrator, OCSPP

P: 202-564-1273

Ex. 6 Personal Privacy (PP)

Beck. Nancy@epa.gov

On Aug 22, 2017, at 12:00 PM, Henry, Tala < Henry, Tala@epa.gov > wrote:

From: Henry, Tala

Sent: Tuesday, August 22, 2017 9:37 AM **To:** Blair, Susanna@epa.gov>

Subject: RE: TCE

More "meta" information on how the Cardiac Toxicity Assessment Update was conducted can be found in a document in the Docket for the Risk Assessment here:

https://www.regulations.gov/document?D=EPA-HQ-OPPT-2012-0723-0045

Tala R. Henry, Ph.D.
Director, Risk Assessment Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency

T: 202-564-2959 E: henry.tala@epa.gov

From: Blair, Susanna

Sent: Tuesday, August 22, 2017 9:22 AM **To:** Henry, Tala < Henry, Tala@epa.gov>

Subject: RE: TCE

Perfect - thanks!

From: Henry, Tala

Sent: Tuesday, August 22, 2017 9:21 AM
To: Blair, Susanna < Blair, Susanna@epa.gov>

Subject: RE: TCE

It is Appendix N in OPPT's TCE Assessment at:

https://www.epa.gov/sites/production/files/2015-09/documents/tce_opptworkplanchemra_final_062414.pdf

Tala R. Henry, Ph.D.
Director, Risk Assessment Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency

T: 202-564-2959 E: henry.tala@epa.gov

From: Blair, Susanna

Sent: Tuesday, August 22, 2017 9:11 AM **To:** Henry, Tala < <u>Henry.Tala@epa.gov</u>>

Subject: FW: TCE

See Nancy's request below.

From: Beck, Nancy

Sent: Tuesday, August 22, 2017 8:49 AM **To:** Dunton, Cheryl < <u>Dunton.Cheryl@epa.gov</u>>

Subject: RE: TCE

Thanks. I'm specifically looking for the supplemental ORD hazard assessment (or maybe it was called a WOE evaluation) that was added to the docket. Where do I find the docket number to find the document? It was an ORD document but its not on the IRIS page.

Or alternatively, do you know where I can find it?

Thanks!

Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP P: 202-564-1273

Ex. 6 Personal Privacy (PP)
beck.nancy@epa.gov

From: Dunton, Cheryl

Sent: Tuesday, August 22, 2017 8:43 AM **To:** Beck, Nancy <<u>Beck, Nancy@epa.gov</u>>

Subject: RE: TCE

https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluation-trichloroethylene-tce-0#pre-lautenberg

From: Beck, Nancy

Sent: Tuesday, August 22, 2017 8:40 AM

To: Dunton, Cheryl < <u>Dunton.Cheryl@epa.gov</u>>

Subject: TCE

Cheryl,

I'm trying to find the documents for the TCE risk assessment that the TSCA program did. It should be on this page: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/assessments-conducted-tsca-work-plan-chemicals-prior

But the completed assessments are not here. Do you know where I can find the information/history?

Thanks.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

P: 202-564-1273

Ex. 6 Personal Privacy (PP)

beck.nancy@epa.gov

From: Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]

Sent: 11/1/2017 10:05:34 PM

To: Michael Dourson (dourson.michael@epa.gov) [dourson.michael@epa.gov]

Subject: FW: TCE Briefing

Attachments: TCE_RA Overview_OPPT management_092017_v3.pptx; Supporting materials_Briefing DAA TCE RE_102417.docx;

Makris et al 2016 TCE TCA DCA.PDF

For tomorrow.

Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP

P: 202-564-1273

Ex. 6 Personal Privacy (PP)

beck.nancy@epa.gov

From: Hanley, Mary

Sent: Wednesday, November 1, 2017 5:43 PM

To: Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>

Subject: FW: TCE Briefing

I believe you already have these materials so I wasn't printing again. Let me know if you don't and we can have them printed

From: Hanley, Mary

Sent: Wednesday, November 01, 2017 5:33 PM **To:** Marshall, Venus < <u>Marshall, Venus@epa.gov</u>> **Cc:** Williams, Shirel < <u>williams.shirel@epa.gov</u>>

Subject: FW: TCE Briefing

Miss Venus, could you print these Thursday morning for the folders please. thanks

From: Hanley, Mary

Sent: Wednesday, November 01, 2017 4:20 PM **To:** Williams, Shirel <<u>williams.shirel@epa.gov</u>>

Subject: FW: TCE Briefing

Miss Shirel,

Please print for today's folders

Thanks

From: Scheifele, Hans

Sent: Monday, October 30, 2017 5:03 PM **To:** Bolen, Derrick bolen.derrick@epa.gov

Cc: Hanley, Mary < Hanley. Mary@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: FW: TCE Briefing

Hi Derrick,

Change of plans. We spoke to Jeff and we would like to use the timeslot at 3:30pm this Thursday that is currently the "NMP Risk Evaluation" meeting to for the "TCE Risk Briefing" meeting request in Alison's note below. Can you please find a time to reschedule the NMP meeting to the week of 11/13 and use the timeslot at 3:30 this Thursday for the TCE meeting?

Thanks in advance, Hans

Hans Scheifele Special Assistant Office of Pollution Prevention and Toxics 1200 Pennsylvania Ave., NW Washington, DC 20460 Voice (202) 564-3122

From: Pierce, Alison

Sent: Monday, October 30, 2017 11:31 AM **To:** Bolen, Derrick < bolen.derrick@epa.gov>

Cc: Hanley, Mary < Hanley, Mary@epa.gov>; Scheifele, Hans < Scheifele, Hans@epa.gov>

Subject: FW: TCE Briefing

Derrick -

Per conversation, here's the information on the TCE meeting that was cancelled and needs to be rescheduled.

Thanks for the assistance!

Alison

ALISON PIERCE

Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. Washington, DC 20460 USA

PIERCE.ALISON@EPA.GOV

202.564.2437

From: Pierce, Alison

Sent: Tuesday, October 24, 2017 3:17 PM
To: Hanley, Mary < Hanley. Mary@epa.gov >
Cc: Scheifele, Hans@epa.gov >

Subject: FW: TCE Briefing

Per your request – here's the TCE info again (and the materials that had been sent up previously).

-a

Title of Meeting	TCE Risk Evaluation
Date	As soon as practicable
Length	50 minutes

Attendees	Jeff Morris*; Tanya Mottley; Tala Henry*; Stan Barone*; Iris Camacho; Nhan Nguyen; Yvette Selby-Mohamadu; Chris Brinkerhoff; Hans Scheifele; Mary Hanley; Maria Doa; Joel Wolf; Michael Dourson; Charlotte Bertrand
	CC: Alison Pierce; Mark Hartman
POC for Meeting	Hans Scheifele
Materials	

ALISON PIERCE

Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. Washington, DC 20460 USA

PIERCE.ALISON@EPA.GOV

202.564.2437

From: Wolf, Joel [Wolf.Joel@epa.gov]

Sent: 8/4/2017 8:10:02 PM

To: Krasnic, Toni [krasnic.toni@epa.gov]
Subject: RE: TCE Developmental Toxicity Study

Thanks for sending. I'll be very interested to see what comes of it.

Joel Wolf Chief, Existing Chemicals Branch OCSPP/OPPT/CCD US Environmental Protection Agency WJC East, Room 4121A 202.564.0432, wolf.joel@epa.gov

From: Krasnic, Toni

Sent: Friday, August 04, 2017 2:54 PM **To:** Wolf, Joel <Wolf.Joel@epa.gov>

Subject: FW: TCE Developmental Toxicity Study

Ex. 5 Deliberative Process (DP)

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Krasnic, Toni

Sent: Thursday, August 03, 2017 11:22 AM

To: 'John Bell' <jbell@hsia.org>

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com >; fgraul@hsia.org

Subject: RE: TCE Developmental Toxicity Study

John,

As I discussed with Caffey, TSCA §8(e) requires manufacturers (including importers), processors, and distributors of chemicals to notify EPA immediately of information obtained that reasonably supports the conclusion that their substances or mixtures present a substantial risk of injury to health or the environment. TSCA §8(e)-reportable information can come from a variety of sources including, but not limited to, draft, interim, or final written reports (e.g., study reports) or verbal reports (received at meetings or by phone) that involve, among other things, observations (including preliminary observations) from, for example, controlled or uncontrolled animal studies. EPA has emphasized that "reasonably supports the conclusion" of substantial risk is not identical to a conclusive demonstration of substantial risk. Reasonable support is typically obtained at an earlier stage of evaluation than conclusive evidence, which may require long-term health or environmental risk assessments of the subject chemical to establish certainty. A submitter only has to obtain information that reasonably supports a conclusion that a chemical substance can cause an effect of concern to demonstrate that TSCA §8(e) reporting should occur.

Companies not sure whether information should be reported under TSCA §8(e) can report the information to EPA as a "For Your Information (FYI)" submission. Within this FYI category is information not judged by the submitter to

reasonably support a conclusion of substantial risk, as well as those situations where the submitter does not have a TSCA §8(e) reporting obligation (e.g., when the submitter is not a person or entity engaged in activities involving the manufacture, importation, processing, or distribution in commerce of the chemical substance or mixture). Please note, however, that timing is always relevant for filing a submission determined to contain §8(e) substantial risk information. EPA considers a person to have "immediately informed" the Agency of 8(e) substantial risk information if it is received by EPA no later than the 30th calendar day after the date the subject person obtained such information. Therefore, if a person files information as an FYI submission because the person is uncertain of whether it is substantial risk information, the submitter should file the information within the 30-day window after obtaining it in order to avoid a possible TSCA §8(e) reporting violation. EPA encourages the submission of information under this voluntary adjunct to TSCA §8(e), especially on chemicals, such as trichlorethylene, currently under review by EPA.

Please let me know if you have any additional questions.

Sincerely,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: John Bell [mailto:jbell@hsia.org]
Sent: Wednesday, July 26, 2017 5:54 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com>; fgraul@hsia.org

Subject: TCE Developmental Toxicity Study

Toni

Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office.

Ex. 6 Personal Privacy (PP)

I am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.

Given this background, we are not confident that the study produced <u>any</u> evidence of a "substantial risk" and would be very concerned about submitting the audited draft report for fear that the information in it could be misinterpreted for the reasons described above. As we fully intend to rerun the study, are we under any time constraints which would require us to submit the results of this flawed study now? Thanks and we look forward to your response.

Regards John

John U. Bell, Ph.D.
Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700

Arlington, VA 22201 703.875.0684 202.286.6464 (cell) jbell@hsia.org www.hsia.org

From: Canavan, Sheila [Canavan.Sheila@epa.gov]

Sent: 6/13/2019 12:50:51 PM

To: Calvo, Kathy [Calvo.Kathy@epa.gov]; Krasnic, Toni [krasnic.toni@epa.gov]; Passe, Loraine [Passe.Loraine@epa.gov];

Lee, Virginia [Lee.Virginia@epa.gov]

CC: Wolf, Joel [Wolf.Joel@epa.gov]

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

Believe me, they are contributing.

From: Calvo, Kathy

Sent: Thursday, June 13, 2019 8:50 AM

To: Canavan, Sheila < Canavan. Sheila@epa.gov>; Krasnic, Toni < krasnic.toni@epa.gov>; Passe, Loraine

<Passe.Loraine@epa.gov>; Lee, Virginia <Lee.Virginia@epa.gov>

Cc: Wolf, Joel <Wolf.Joel@epa.gov>

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

Everybody has to contribute.

Kathleen Calvo, CRM
Chemical Information and Testing Branch
Chemical Control Division
US EPA, Office of Pollution Prevention and Toxics
(202) 564-8089

From: Canavan, Sheila

Sent: Thursday, June 13, 2019 8:46 AM

To: Calvo, Kathy < Calvo. Kathy@epa.gov >; Krasnic, Toni < krasnic.toni@epa.gov >; Passe, Loraine

<Passe.Loraine@epa.gov>; Lee, Virginia <Lee.Virginia@epa.gov>

Cc: Wolf, Joel < Wolf.Joel@epa.gov>

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

RAD should lead. However, they are swamped so if they do not want to lead or cannot spare the band-width, maybe we could help them out.

From: Calvo, Kathy

Sent: Thursday, June 13, 2019 8:35 AM

To: Krasnic, Toni krasnic.toni@epa.gov; Canavan, Sheila Canavan.Sheila@epa.gov; Passe, Loraine

<Passe.Loraine@epa.gov>; Lee, Virginia <Lee.Virginia@epa.gov>

Cc: Wolf, Joel < Wolf.Joel@epa.gov>

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

Thanks, Toni and Sheila. Can someone please clarify which division (CCD or RAD) should be the lead to reach out to the others?

Kathleen Calvo, CRM
Chemical Information and Testing Branch
Chemical Control Division
US EPA, Office of Pollution Prevention and Toxics
(202) 564-8089

From: Krasnic, Toni

Sent: Thursday, June 13, 2019 6:03 AM

To: Canavan, Sheila < Canavan, Sheila@epa.gov>; Calvo, Kathy < Calvo, Kathy@epa.gov>; Passe, Loraine

<Passe.Loraine@epa.gov>; Lee, Virginia <Lee.Virginia@epa.gov>

Cc: Wolf, Joel < Wolf Joel@epa.gov>

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

Hi Kathy,

Keith Jacobs in RAD was the lead on the HSIA study but he was working with a team inside RAD and few others at EPA. Please check with Keith about others at EPA who might have responsive documents.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Canavan, Sheila

Sent: Wednesday, June 12, 2019 4:58 PM

To: Calvo, Kathy Calvo,Kathy@epa.gov; Passe, Loraine Passe, Loraine@epa.gov; Lee, Virginia

<Lee.Virginia@epa.gov>

Cc: Wolf, Joel < Wolf. Joel@epa.gov >; Krasnic, Toni < krasnic.toni@epa.gov >

Subject: RE: FOIA Assignment for EPA-HQ-2019-006115

Yes and also RAD. Toni Krasnic will let you know who in RAD.

From: Calvo, Kathy

Sent: Wednesday, June 12, 2019 3:30 PM

To: Canavan, Sheila < Canavan. Sheila@epa.gov>; Passe, Loraine < Passe. Loraine@epa.gov>; Lee, Virginia

<lee.Virginia@epa.gov>

Subject: FW: FOIA Assignment for EPA-HQ-2019-006115

Would this FOIA belong to Joel/Jeff?

Kathleen Calvo, CRM
Chemical Information and Testing Branch
Chemical Control Division
US EPA, Office of Pollution Prevention and Toxics
(202) 564-8089

From: Latham, John

Sent: Wednesday, June 12, 2019 2:51 PM **To:** Calvo, Kathy < <u>Calvo, Kathy@epa.gov</u>>

Subject: FW: FOIA Assignment for EPA-HQ-2019-006115

Hi Kathy,

Below is a new FOIA request assigned to OPPT. Would CCD have any responsive materials for this request?

Thanks, John Latham Jr. Environmental Protection Agency OCSPP/OPPT/EAD/OB (7408M) 1200 Pennsylvania Ave NW Washington, DC 20460

Ph: 202-564-6754 Fax: 202-564-8197

From: admin@foiaonline.gov <admin@foiaonline.gov>

Sent: Wednesday, June 12, 2019 12:02 PM **To:** Latham, John <<u>Latham_John@epa.gov</u>>

Subject: FOIA Assignment for EPA-HQ-2019-006115

Your office has been assigned to the FOIA request - EPA-HQ-2019-006115. Additional details for this item are as follows:

Tracking Number: EPA-HQ-2019-006115

Requester: Elizabeth Shogren

Request Track: Simple

Submitted Date: 05/30/2019

Due Date: 07/05/2019Short Description: N/A

Description: I request any correspondence between EPA officials and representatives of HSIA, the Halogenated Solvent Industry Alliance, or any other industry groups or companies that contain the terms TCE or Trichloroethylene and/or fetal hearts. I'm especially interested in any correspondence concerning a November 2018 study related to TCE's fetal heart effects that was sponsored by HSIA, and referenced in this press release: https://hsia.org/wp-content/uploads/2018/11/Cardiac-Study-Press-Release-Final.pdf. I'd also line any correspondence between EPA and companies or industry groups concerning proposed bans of TCE under TSCA. I would also like any notes or recordings from or references to any meetings or conference calls between the industry groups and companies and EPA. The time frame that interests me is November 2016 to the present.

From: Bethel, Heidi [Bethel.Heidi@epa.gov]

Sent: 11/22/2019 3:19:10 PM

To: Krasnic, Toni [krasnic.toni@epa.gov]

Subject: RE: TCE FOIAs with Dec. 4 due date: RE: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Toni,

I would absolutely try to narrow it. It's too broad. Emails from the requestor indicate that they are willing to narrow it. I need to know who the OPPT FOIA POC is. I am checking the intranet. Do you know?

I am working from home today:

Ex. 6 Personal Privacy (PP)

Heidi

From: Krasnic, Toni <krasnic.toni@epa.gov> **Sent:** Friday, November 22, 2019 10:17 AM **To:** Bethel, Heidi <Bethel.Heidi@epa.gov>

Subject: RE: TCE FOIAs with Dec. 4 due date: RE: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Hi Heidi,

This is a very broad request. As you mention in your email, please see if you can narrow it down.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Nguyen, Nhan < Nguyen.Nhan@epa.gov> Sent: Friday, November 22, 2019 9:52 AM

To: Bethel, Heidi <Bethel, Heidi@epa.gov>; Jacobs, Keith <jacobs, keith@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>
Cc: Choudhary, Rehan <choudhary.rehan@epa.gov>; Fehrenbacher, Cathy <Fehrenbacher, Cathy@epa.gov>; Barone,

Stan < Barone. Stan@epa.gov>

Subject: RE: TCE FOIAs with Dec. 4 due date: RE: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Thanks Heidi. Please get in touch with Sharon Frazer about procedures and searches.

Nhan

Nhan Nguyen
Chief, Assessment Branch V
Risk Assessment Division
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-564-8526

From: Bethel, Heidi <<u>Bethel.Heidi@epa.gov</u>> Sent: Friday, November 22, 2019 9:50 AM

To: Nguyen, Nhan < Nguyen. Nhan@epa.gov>; Jacobs, Keith < jacobs.keith@epa.gov>; Krasnic, Toni

<krasnic.toni@epa.gov>

Cc: Choudhary, Rehan <choudhary.rehan@epa.gov>; Fehrenbacher, Cathy <<u>Fehrenbacher.Cathy@epa.gov</u>>; Barone,

Stan < Barone. Stan@epa.gov>

Subject: TCE FOIAs with Dec. 4 due date: RE: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Nhan and all,

Per your request, I can work on this FOIA on TCE on correspondence with HISA and EPA employees or the TCE ban. If anyone knows the OCSPP/ OPPT FOIA contact, please send their name to me or I will contact the IO. I may be able to have preliminary information and records on this by early next week, but not completed. I have FOIA experience from the OW IO. Let me do some research this morning on the request and current procedures before I send any instructions to the relevant group. We may be able to ask the requestor to limit or narrow some of the request as parts of it are very vague and will produce too large of a search.

Please give me a few hours this morning to do some research on current procedures and get access to the records mentioned below and I will get back to you later this morning.

T	nar	ıks,
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Heidi

From: Nguyen, Nhan < Nguyen.Nhan@epa.gov > Sent: Friday, November 22, 2019 7:01 AM

To: Jacobs, Keith < jacobs.keith@epa.gov>; Bethel, Heidi < Bethel, Heidi@epa.gov>; Krasnic, Toni < krasnic.toni@epa.gov>

Cc: Choudhary, Rehan < choudhary.rehan@epa.gov>

Subject: FW: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Will need your help on this. Please let me know if you think we can have a response to this FOIA by cob Dec. 4?

Thanks

All,

Can you please start compiling the information by searching your emails with key words. I believe there will be meeting notes for these meetings including those in the docket?

There is a software to quickly search for relevant emails. Jay Jon has used for a recent FOIA so we may want to talk to Jay.

Given the fact that this FOIA was submitted 6 months ago, we need to quickly respond to this FOIA.

Heidi,

Can you please help take the lead on this since I expect Keith to be busy incorporating edits from Stan so we can send the RE to OPPT IO hopefully Monday next week.

Please try to compile information by cob Monday or Tuesday if possible. We'll see where we are on Monday and Tuesday.

Thanks

Nhan

Nhan Nguyen
Chief, Assessment Branch V
Risk Assessment Division
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-564-8526

From: Fehrenbacher, Cathy < Fehrenbacher. Cathy@epa.gov>

Sent: Thursday, November 21, 2019 7:09 PM **To:** Frazier, Sharon < Frazier, Sharon@epa.gov> **Cc:** Nguyen, Nhan < Nguyen.Nhan@epa.gov>

Subject: Re: EPA-HQ-2020-001229 and EPA-HQ-2019-006115

Please assign this to Nhan.

Cathy Fehrenbacher, CIH
Acting Director
Risk Assessment Division
U.S Environmental Protection Agency
Office of Pollution Prevention and Toxics
Washington, DC.

Sent from my iPhone

On Nov 21, 2019, at 9:48 AM, Frazier, Sharon < Frazier. Sharon@epa.gov> wrote:

Cathy,

This is an old FOIA highlighted below in yellow that wasn't assigned, can you please let me know who this should be assigned to? I got a e-mails message from the requester Elizabeth Shogren requesting a response to the FOIA's (see below). I believe the FOIA are the requesting the same information,

Ms. Frazier,

I'm resending this. I would be grateful if you would reply and give me an idea of when I might see responses to my now six-month old request for documents..

• Appeal Tracking Number: EPA-HQ-2020-001229

• Request Tracking Number: EPA-HQ-2019-006115

Sincerely,

Elizabeth Shogren

I request any correspondence between EPA officials and representatives of HSIA, the Halogenated Solvent Industry Alliance, or any other industry groups or companies that contain the terms TCE or Trichloroethylene and/or fetal hearts. I'm especially interested in any correspondence concerning a November 2018 study related to TCE's fetal heart effects that was sponsored by HSIA, and referenced in this press release: https://hsia.org/wp-content/uploads/2018/11/Cardiac-Study-Press-Release-Final.pdf. I'd also line any correspondence between EPA and companies or industry groups concerning proposed bans of TCE under TSCA. I would also like any notes or recordings from or references to any meetings or conference calls between the industry groups and companies and EPA. The time frame that interests me is November 2016 to the present.

From: Wolf, Joel [Wolf.Joel@epa.gov]

Sent: 6/22/2018 9:30:11 PM

To: Pierce, Alison [Pierce.Alison@epa.gov]

CC: Ortiz, Julia [Ortiz.Julia@epa.gov]; Vendinello, Lynn [Vendinello.Lynn@epa.gov]; Canavan, Sheila

[Canavan.Sheila@epa.gov]; Krasnic, Toni [krasnic.toni@epa.gov]; Kramek, Niva [kramek.niva@epa.gov]; Bethel,

Heidi [Bethel.Heidi@epa.gov]; Blair, Susanna [Blair.Susanna@epa.gov]

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Attachments: TCE-Roundtable 2018-06-28 EPA v5 redline.pptx; TCE-Roundtable 2018-06-28 EPA v6.pptx

Hi Alison,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if there are any additional edits needed.

Thanks, Joel

Joel Wolf

Chief, Existing Chemicals Branch

OCSPP/OPPT/CCD

US Environmental Protection Agency

WJC East, Room 4121A

202.564.0432, wolf.joel@epa.gov

From: Wolf, Joel

Sent: Friday, June 22, 2018 2:40 PM

To: Pierce, Alison < Pierce. Alison@epa.gov>

Cc: Ortiz, Julia <Ortiz.Julia@epa.gov>; Vendinello, Lynn <Vendinello.Lynn@epa.gov>; Canavan, Sheila

<Canavan.Sheila@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov>; Kramek, Niva <kramek.niva@epa.gov>; Bethel, Heidi

<Bethel.Heidi@epa.gov>

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Hi Alison,

Here are the slides for next week's KS TCE roundtable for OPPT IO and OCSPP IO review. OGC has reviewed them.

Thanks, Joel

From: Pierce, Alison

Sent: Tuesday, June 19, 2018 12:08 PM

To: Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>; Bethel, Heidi <<u>Bethel.Heidi@epa.gov</u>>
Cc: Wen, Chen <<u>Wen.Chen@epa.gov</u>>; Motilall, Christina <<u>Motilall.Christi</u>na@epa.gov>

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Looping you guys since you're the worker bees making this happen! Know that it's not a lot of time – but please be sure to get the OPPT IO your slides for the event this week (presuming it's still happening on June 28).

Thanks much...

Alison

Auson Pierce 202.564.2437

From: Pierce, Alison

Sent: Tuesday, June 19, 2018 10:15 AM

To: Fehrenbacher, Cathy < Fehrenbacher. Cathy@epa.gov>; Vendinello, Lynn < Vendinello.Lynn@epa.gov>; Morris, Jeff

<Morris.Jeff@epa.gov>

Cc: Henry, Tala < Henry. Tala@epa.gov>

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Thanks everyone, I'll let the organizers know.

Ex. 5 Deliberative Process (DP)

ALISON PIERCE 202.564.2437

From: Fehrenbacher, Cathy

Sent: Tuesday, June 19, 2018 7:48 AM

To: Vendinello, Lynn < Vendinello.Lynn@epa.gov >; Morris, Jeff < Morris.Jeff@epa.gov > Cc: Henry, Tala < Henry.Tala@epa.gov >; Pierce, Alison < Pierce.Alison@epa.gov >

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Heidi Bethel will participate from RAD.

Cathy Fehrenbacher, CIH
Acting Director, Risk Assessment Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. (7403M)
Washington, DC 20460

Phone: (202) 564-8551 Fax: (202) 564-7450

Deliveries: 1201 Constitution Ave N.W., room 6220A EPA East

From: Vendinello, Lynn

Sent: Monday, June 18, 2018 8:24 AM

To: Morris, Jeff < Morris_Jeff@epa_gov>; Fehrenbacher, Cathy < Fehrenbacher.Cathy@epa_gov>

Cc: Henry, Tala < Henry, Tala@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Lynn Vendinello Acting Division Director Chemical Control Division Office of Pollution Prevention and Toxics US. EPA 202-566-0514

From: Morris, Jeff

Sent: Monday, June 18, 2018 7:59 AM

To: Vendinello, Lynn < Vendinello, Lynn@epa.gov>; Fehrenbacher, Cathy < Fehrenbacher, Cathy@epa.gov>

Cc: Henry, Tala < Henry, Tala@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Importance: High

I think we should do this, virtually. I recommend co-presenters from RAD and CCD.

Thanks.

Jeff

From: Nancy Larson [mailto:nlarson@ksu.edu]

Sent: Friday, June 15, 2018 4:22 PM To: Morris, Jeff < Morris, Jeff@epa.gov>

Cc: pierce.allison@epa.gov

Subject: Request EPA TSCA speaker for TCE roundtable

Importance: High

Good afternoon Mr. Morris:

I am writing to officially request you permit one of your EPA staff to provide a brief overview and update related to TSCA and TCE. The presenter is welcome to provide this information virtually or in person. We would like to host our roundtable meeting as early as June 28th, so a timely response is requested.

As your staff knows, our Kansas P2 program is working with aerospace TCE users. We hosted one successful meeting last fall and postponed the second meeting when our EPA speaker was not able to present due to the development of the recently published "Problem Formulation" document.

Our roundtable industry partners include representatives from Spirit, Cessna Textron, Boeing and other TCE TRI reporters. These partners will likely provide comments during the short 45-day comment period, so we would like to have a knowledgeable EPA staff available to present and answer questions.

Again, I am moving quickly to schedule this second roundtable and would appreciate your support.

Sincerely, Nancy J. Larson, R.S. Kansas State University Director, Pollution Prevention Institute Small Business Environmental Assistance Program 316-660-0104 (Desk) 800-578-8898 (Hotline)

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 6/20/2018 3:03:39 PM

To: Wolf, Joel [Wolf.Joel@epa.gov]

CC: Forrest, Kesha [Forrest.Kesha@epa.gov]; Kramek, Niva [kramek.niva@epa.gov]; Wen, Chen [Wen.Chen@epa.gov]

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Attachments: TCE-Roundtable 2018-06-28 EPA.PPTX

Hi Joel,

Attached are the draft TCE slides. I'm still waiting for RAD to review slide 10 and update slide 21. They said they'll send me the revisions by COB today.

Proposed review schedule:

RAD and CCD staff: COB Wed

Thu morning: Joel and Sheila; OGC?Thu afternoon: RAD DD and CCD DD

Fri morning: OPPT IO

Not sure when to send to OGC since they also asked for OGC to review - perhaps when I send to you and Sheila?

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Wolf, Joel

Sent: Tuesday, June 19, 2018 1:42 PM

To: Wen, Chen < Wen.Chen@epa.gov>; Kramek, Niva < kramek.niva@epa.gov> **Cc:** Krasnic, Toni < krasnic.toni@epa.gov>; Forrest, Kesha < Forrest.Kesha@epa.gov>

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Thanks for the heads up Chen.

......

Joel Wolf

Chief, Existing Chemicals Branch

OCSPP/OPPT/CCD

US Environmental Protection Agency

WJC East, Room 4121A

202.564.0432, wolf.joel@epa.gov

From: Wen, Chen

Sent: Tuesday, June 19, 2018 1:41 PM

To: Wolf, Joel <<u>Wolf.Joel@epa.gov</u>>; Kramek, Niva <<u>kramek.niva@epa.gov</u>>
Cc: Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>; Forrest, Kesha <<u>Forrest.Kesha@epa.gov</u>>

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Hi Joel and Niva,

Just wanted to give you a quick heads-up about this – see chain below. Toni got volunteered to do a presentation on TSCA and TCE by Jeff M.

I'll be including it in the external meetings report.

Chen

From: Pierce, Alison

Sent: Tuesday, June 19, 2018 1:13 PM **To:** Wen, Chen < Wen.Chen@epa.gov>

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Yes please!

Auson Pierce 202.564.2437

From: Wen, Chen

Sent: Tuesday, June 19, 2018 1:12 PM **To:** Pierce, Alison < <u>Pierce, Alison@epa.gov</u>>

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Small world! I used to work with Nancy Larson on health care stuff!

Toni's working on it in conjunction with Heidi, and thought he'd have something real soon.

Shall I put it in the external meeting report as well?

Chen

From: Pierce, Alison

Sent: Tuesday, June 19, 2018 12:08 PM

To: Krasnic, Toni krasnic.toni@epa.gov>; Bethel, Heidi Bethel, Heidi <a href="mailto:Bethel.

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Looping you guys since you're the worker bees making this happen! Know that it's not a lot of time – but please be sure to get the OPPT IO your slides for the event this week (presuming it's still happening on June 28).

Thanks much...

Alison

ALISON PIERCE 202.564.2437

From: Pierce, Alison

Sent: Tuesday, June 19, 2018 10:15 AM

To: Fehrenbacher, Cathy <<u>Fehrenbacher.Cathy@epa.gov</u>>; Vendinello, Lynn <<u>Vendinello.Lynn@epa.gov</u>>; Morris, Jeff <<u>Morris.Jeff@epa.gov</u>>

Cc: Henry, Tala < Henry. Tala@epa.gov>

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Thanks everyone, I'll let the organizers know.

Lynn, Cathy – for awareness, Nancy has relayed that she'd like to see the slides that folks plan to use for this expeditiously, as she wants "plenty of time" to review them before the event. To the extent practicable, can you push your folks to have the OGC/DD reviewed deck up to the OPPT IO by the end of the week? Know that this isn't a lot of time, but I do expect that there will be a bit of back and forth on this one.

ALISON PIERCE 202.564.2437

From: Fehrenbacher, Cathy

Sent: Tuesday, June 19, 2018 7:48 AM

To: Vendinello, Lynn < Vendinello. Lynn@epa.gov >; Morris, Jeff < Morris. Jeff@epa.gov > Cc: Henry, Tala@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Heidi Bethel will participate from RAD.

Cathy Fehrenbacher, CIH
Acting Director, Risk Assessment Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. (7403M)
Washington, DC 20460

Phone: (202) 564-8551 Fax: (202) 564-7450

Deliveries: 1201 Constitution Ave N.W., room 6220A EPA East

From: Vendinello, Lynn

Sent: Monday, June 18, 2018 8:24 AM

To: Morris, Jeff < Morris Jeff@epa.gov>; Fehrenbacher, Cathy < Fehrenbacher. Cathy@epa.gov>

Cc: Henry, Tala < Henry, Tala@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: RE: Request EPA TSCA speaker for TCE roundtable

Hi Jeff, CCD can have Tony Krasnic discuss the rule on June 28th if that is their desired date. Tony goes on a two week vacation after that so the 28th would actually be a good day. Thanks.

Lynn Vendinello
Acting Division Director
Chemical Control Division
Office of Pollution Prevention and Toxics
US. EPA
202-566-0514

From: Morris, Jeff

Sent: Monday, June 18, 2018 7:59 AM

To: Vendinello, Lynn < Vendinello, Lynn@epa.gov>; Fehrenbacher, Cathy < Fehrenbacher, Cathy@epa.gov>

Cc: Henry, Tala < Henry. Tala@epa.gov >; Pierce, Alison < Pierce. Alison@epa.gov >

Subject: FW: Request EPA TSCA speaker for TCE roundtable

Importance: High

I think we should do this, virtually. I recommend co-presenters from RAD and CCD.

Thanks.

Jeff

From: Nancy Larson [mailto:nlarson@ksu.edu]

Sent: Friday, June 15, 2018 4:22 PM **To:** Morris, Jeff < Morris_Jeff@epa_gov>

Cc: pierce.allison@epa.gov

Subject: Request EPA TSCA speaker for TCE roundtable

Importance: High

Good afternoon Mr. Morris:

I am writing to officially request you permit one of your EPA staff to provide a brief overview and update related to TSCA and TCE. The presenter is welcome to provide this information virtually or in person. We would like to host our roundtable meeting as early as June 28th, so a timely response is requested.

As your staff knows, our Kansas P2 program is working with aerospace TCE users. We hosted one successful meeting last fall and postponed the second meeting when our EPA speaker was not able to present due to the development of the recently published "<u>Problem Formulation</u>" document.

Our roundtable industry partners include representatives from Spirit, Cessna Textron, Boeing and other TCE TRI reporters. These partners will likely provide comments during the short 45-day comment period, so we would like to have a knowledgeable EPA staff available to present and answer questions.

Again, I am moving quickly to schedule this second roundtable and would appreciate your support.

Sincerely,
Nancy J. Larson, R.S.
Kansas State University
Director, Pollution Prevention Institute
Small Business Environmental Assistance Program
316-660-0104 (Desk)
800-578-8898 (Hotline)
nlarson@ksu.edu

From: Blake-Hedges, Lynne [Blake-Hedges.Lynne@epa.gov]

Sent: 7/12/2017 9:35:35 PM

To: Krasnic, Toni [krasnic.toni@epa.gov]; Brown, Judith [Brown.Judith@epa.gov]

Subject: RE: For Review (COB 7/12): Section 6 Briefing PPT for OD and DAA

Attachments: Section 6 rules_2017-07-07 lbh 1.pptx

Hi Toni,

I went through the slides quickly and intend to look at them again first thing tomorrow morning. I have some initial comments. I will recheck the numbers tomorrow, however, I'm assuming that they were taken from the preamble with the proposal. I will let you know if there are discrepancies tomorrow.

Lynne

From: Krasnic, Toni

Sent: Wednesday, July 12, 2017 1:54 PM **To:** Brown, Judith <Brown.Judith@epa.gov>

Cc: Blake-Hedges, Lynne <Blake-Hedges.Lynne@epa.gov>

Subject: RE: For Review (COB 7/12): Section 6 Briefing PPT for OD and DAA

Thanks Judith! Please see my responses in red below.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Brown, Judith

Sent: Wednesday, July 12, 2017 11:33 AM **To:** Krasnic, Toni < <u>krasnic.toni@epa.gov</u>>

Cc: Blake-Hedges, Lynne < Blake-Hedges.Lynne@epa.gov>

Subject: RE: For Review (COB 7/12): Section 6 Briefing PPT for OD and DAA

A couple of comments or points I found confusing.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

I'll check with Joel.

Other than these comments, the slides look fine (numbers check out and didn't see typos, etc). Thanks!

From: Krasnic, Toni

Sent: Wednesday, July 12, 2017 8:12 AM **To:** Brown, Judith srown.judith@epa.gov>

Cc: Blake-Hedges, Lynne < Blake-Hedges.Lynne@epa.gov>

Subject: FW: For Review (COB 7/12): Section 6 Briefing PPT for OD and DAA

Hi Judith,

Joel said that Lynne might be out for few more days and that you volunteered to take a look at the TCE briefing PPT.

Please send me any edits by COB today.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Krasnic, Toni

Sent: Friday, July 07, 2017 4:08 PM

To: Brinkerhoff, Chris <Brinkerhoff, Chris@epa.gov>; Blake-Hedges, Lynne <Blake-Hedges.Lynne@epa.gov>

Cc: Nhan Nguyen < Nguyen. Nhan@epa.gov>; Rice, Cody < Rice. Cody@epa.gov>

Subject: For Review (COB 7/12): Section 6 Briefing PPT for OD and DAA

Chris and Lynne,

Section 6 briefings were scheduled for 7/18 (OD) and 7/24 (DAA) for discussion on path forward on the two section 6 rules. The two meetings have been set but the meeting invites are still being sent out.

The briefing PPT is attached. I've reused our past slides (which you've reviewed previously) and added few additional slides summarizing major comments on the TCE rules.

Please send me your edits/comments by COB 7/12.

Thanks,

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 12/6/2018 3:27:31 PM

To: Parsons, Doug [Parsons.Douglas@epa.gov]

Subject: RE: DDs Existing Chemicals

Ex. 5 Deliberative Process (DP)

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Parsons, Doug

Sent: Thursday, December 06, 2018 10:15 AM
To: Krasnic, Toni < krasnic.toni@epa.gov>
Subject: RE: DDs Existing Chemicals

Thanks. Have you told Caffee the "won't review till final approach"

d

From: Krasnic, Toni

Sent: Thursday, December 06, 2018 10:12 AM **To:** Parsons, Doug < parsons.bouglas@epa.gov>

Subject: RE: DDs Existing Chemicals

Technical directive. Usually given to contractors on what EPA wants them to do.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Parsons, Doug

Sent: Thursday, December 06, 2018 9:42 AM **To:** Krasnic, Toni < <u>krasnic.toni@epa.gov</u>> **Subject:** FW: DDs Existing Chemicals

What does TD mean?

From: Jacobs, Keith

Sent: Tuesday, December 04, 2018 6:07 PM

To: Nguyen, Nhan < Nguyen. Nhan@epa.gov>; Krasnic, Toni < krasnic.toni@epa.gov>

Cc: Wolf, Joel < Wolf. Joel@epa.gov>; Bethel, Heidi < Bethel. Heidi@epa.gov>; Parsons, Doug

<Parsons.Douglas@epa.gov>; Bethel, Heidi <Bethel.Heidi@epa.gov>; Brinkerhoff, Chris <Brinkerhoff.Chris@epa.gov>

Subject: RE: DDs Existing Chemicals

Ex. 5 Deliberative Process (DP)

Keith Jacobs, Ph.D.

William Jefferson Clinton Building East, 6308QQ

Office Phone: 202-564-0146

From: Nguyen, Nhan

Sent: Tuesday, December 4, 2018 4:17 PM **To:** Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>

Cc: Wolf, Joel < Wolf_Joel@epa.gov >; Bethel, Heidi < Bethel. Heidi@epa.gov >; Parsons, Doug

<Parsons.Douglas@epa.gov>; Jacobs, Keith < jacobs.keith@epa.gov>

Subject: RE: DDs Existing Chemicals

Thanks Toni. I will discuss internally and get back with you on Thursday.

Nhan

From: Krasnic, Toni

Sent: Tuesday, December 04, 2018 4:10 PM **To:** Nguyen, Nhan < Nguyen. Nhan@epa.gov>

Cc: Wolf, Joel < Wolf_Joel@epa.gov >; Bethel, Heidi < Bethel. Heidi@epa.gov >; Parsons, Doug

<Parsons.Douglas@epa.gov>; Jacobs, Keith < jacobs.keith@epa.gov>

Subject: RE: DDs Existing Chemicals

Hi Nhan,

There was DD's meeting today with the following agenda items:

- Take aways from Friday existing chemicals meeting
- OMB and DOD briefing for dioxane
- Agenda, slide prep and dry runs for PV 29
- TCE cardiac tox study
- Characterization/selection of representative exposure data
- Risk Evaluation Schedule

After the meeting, Cathy asked that I reach out to you to ask whether you'd like us to setup a *meeting with HSIA* on HSIA's study. If you think it'd be helpful, please let us know and we'll make arrangements.

Thanks.

Toni Krasnic Existing Chemicals Branch

EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

----Original Appointment----

From: Wolf, Joel

Sent: Monday, November 12, 2018 2:35 PM

To: Wolf, Joel; Camacho, Iris; Price, Michelle; Grant, Brian; Braun, Hannah; Brinkerhoff, Chris; Scarano, Louis; Widawsky, David; Passe, Loraine; Kramek, Niva; Tillman, Thomas; Parsons, Doug; Courtnage, Robert; Fehrenbacher, Cathy; Brown, Judith; Tobias, David; Jarmul, Stephanie; Eisenreich, Karen; Prothero, Scott; Lloyd, Tyler; Lee, Virginia; Selby-Mohamadu, Yvette; Vendinello, Lynn; Winchester, Erik; Corado, Ana; Rice, Cody; Blake-Hedges, Lynne; Canavan, Sheila; Krasnic, Toni; Baier-Anderson, Caroline; Nguyen, Nhan; Symmes, Brian; Tierney, Meghan; Motilall, Christina; Laessig, Susan; Hasan, Jafrul; Sharkey, Susan; Reisman, Larry; Turk, David; Mojica, Andrea; Griffin, Stephanie; Aranda, Amber; Wills, Jennifer; Edmonds, Marc; Mottley, Tanya; Comnes, Meredith; Menasche, Claudia; Wen, Chen; Wheeler, Cindy; Wormell, Lance; Feustel, Ingrid; Dawson, Jeffrey; Son, Samgi

Subject: DDs Existing Chemicals

When: Tuesday, December 04, 2018 3:00 PM-3:45 PM (UTC-05:00) Eastern Time (US & Canada).

Where: DCRoomEast4140/DC-EPA-EAST-OCSPP-OPPT-CCD

Getting these back on the calendars.

Ex. 5 Deliberative Process (DP)

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 11/14/2017 11:27:24 AM

To: Parsons, Doug [Parsons.Douglas@epa.gov]; Wolf, Joel [Wolf.Joel@epa.gov]; Corado, Ana [Corado.Ana@epa.gov];

Wheeler, Cindy [Wheeler.Cindy@epa.gov]

Subject: RE: Meeting with BCPP

Attachments: EPA-HQ-OPPT-2016-0387-0699 BCPP.pdf

Please find attached comments they submitted on TCE2.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Parsons, Doug

Sent: Monday, November 13, 2017 1:19 PM

To: Wolf, Joel <Wolf.Joel@epa.gov>; Corado, Ana <Corado.Ana@epa.gov>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>;

Krasnic, Toni <krasnic.toni@epa.gov> **Subject:** RE: Meeting with BCPP

Fine with me too.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Wolf, Joel

Sent: Monday, November 13, 2017 12:05 PM

To: Corado, Ana <Corado.Ana@epa.gov>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>; Krasnic, Toni

<krasnic.toni@epa.gov>; Parsons, Doug <Parsons.Douglas@epa.gov>

Subject: RE: Meeting with BCPP

It would be good to know what they want to talk about.

Tomorrow afternoon is fine for me. Cindy I know is out tomorrow.

Joel Wolf

Chief, Existing Chemicals Branch

OCSPP/OPPT/CCD

US Environmental Protection Agency

WJC East, Room 4121A

202.564.0432, wolf.joel@epa.gov

From: Corado, Ana

Sent: Monday, November 13, 2017 11:26 AM

To: Wolf, Joel < Wolf.Joel@epa.gov>; Wheeler, Cindy < Wheeler.Cindy@epa.gov>; Krasnic, Toni < krasnic.toni@epa.gov>;

Parsons, Doug < Parsons. Douglas@epa.gov>

Subject: FW: Meeting with BCPP

Hi all,

The only time that might work for most of us is tomorrow at 4 pm. Let me know if that is OK.

Ana

Ana Corado, D. Env.
Environmental Engineer
Existing Chemicals Branch, CCD
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
WJC East, Room 4121H
Washington, D.C. 20460

e-mail: corado.ana@epa.gov

phone: 202-564-0140 fax: 202-564-8251

From: Anais Duran [mailto:aduran@rabengroup.com]

Sent: Monday, November 13, 2017 11:17 AM

To: Wolf, Joel < Wolf.Joel@epa.gov >; Wheeler, Cindy < Wheeler.Cindy@epa.gov >; Corado, Ana < Corado.Ana@epa.gov >

Cc: James Colligan < jcolligan@rabengroup.com>

Subject: Meeting with BCPP

Dear Joel, Cindy and Ana,

I'm reaching out on behalf of Nancy Buermeyer and Lisette Van Vliet from the <u>Breast Cancer Prevention</u> <u>Partners (BCPP)</u>. BCPP is in town this week, November 13th through the 17th, and would like to meet with you to discuss the EPA TCE rule.

BCPP is the leading science-based policy and advocacy organization working to prevent breast cancer by eliminating our exposure to toxic chemicals and radiation. Their focus is on the intersection of breast cancer prevention and environmental health.

Might all or a subset of you happen to be available tomorrow before 1 PM or after 2:30 PM? BCPP is also available Thursday or Friday afternoon if that doesn't work.

Thank you and I hope to hear from you soon!

Best, Anais

ANAIS DURAN | SENIOR ASSOCIATE | THE RABEN GROUP 1341 G STREET NW, 5TH FLOOR | WASHINGTON DC 20005 202 587 4931 DIRECT | 202 466 8585 MAIN | 626 622 9785 MOBILE ADURAN@RABENGROUP.COM | WWW.RABENGROUP.COM



Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From:

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 1/18/2018 2:46:11 PM

Boswell, Karen [Boswell.Karen@epa.gov] To: Subject: RE: Lautenberg Chemical Safety Act

Thanks Karen!

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

----Original Message----From: Boswell, Karen

Sent: Thursday, January 18, 2018 9:44 AM

To: Krasnic, Toni <krasnic.toni@epa.gov> Subject: RE: Lautenberg Chemical Safety Act

They like to take the lead with the Lautenbergs. I would follow up with Allison. She's the one I've dealt with on these.

----Original Message----

From: Krasnic, Toni

Sent: Thursday, January 18, 2018 9:42 AM To: Boswell, Karen <Boswell.Karen@epa.gov> Subject: RE: Lautenberg Chemical Safety Act

This one was on TCE disguised under Lautenberg heading. Sheila said that it's more appropriate for RAD to respond than CCD. Not sure if you have POC in RAD; maybe Allison does. Or I can follow up with Heidi.

Thanks,

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB

WJC East, 4134D | (202) 564-0984

----Original Message----From: Boswell, Karen

Sent: Thursday, January 18, 2018 9:34 AM To: Krasnic, Ťóni <krasnic.toni@epa.gov> Subject: RE: Lautenberg Chemical Safety Act

The front office takes care of the Lautenberg questions.

----Original Message----From: Krasnic, Toni

Sent: Thursday, January 18, 2018 8:46 AM To: Boswell, Karen <Boswell.Karen@epa.gov>

Cc: Canavan, Sheila <Canavan.Sheila@epa.gov>; Parsons, Doug <Parsons.Douglas@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>; Bethel, Heidi <Bethel.Heidi@epa.gov>

Subject: RE: Lautenberg Chemical Safety Act

Hi Karen,

This inquiry should be referred to RAD.

I'm also cc'ing Heidi, the TCE risk evaluation WG lead.

Thanks.

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

----Original Message----

From: Boswell, Karen

Sent: Wednesday, January 17, 2018 12:38 PM

To: Canavan, Sheila <Canavan.Sheila@epa.gov>; Parsons, Doug <Parsons.Douglas@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>

Subject: FW: Lautenberg Chemical Safety Act

From: drupal_admin@epa.govOn Behalf OfDonald Wanamaker via EPA

Sent: Wednesday, January 17, 2018 12:38:12 PM (UTC-05:00) Eastern Time (US & Canada)

To: Boswell, Karen

Subject: Lautenberg Chemical Safety Act

Submitted on 01/17/2018 12:38PM Submitted values are:

Name: Donald Wanamaker

Subject: Lautenberg Chemical Safety Act

Email: dwanamaker@emlweb.com

As an Environmental Health Consultant for the past four decades, the human health risk of exposure to

Trichloroethylene (TCE) has not diminished. In 1978 I attended a State Legislature Hearing (in Maine) regarding the McKin Solvent Recovery Site (in Grey, Maine). I listened as a mother (Kathy Hines) testified that her private well water was contaminated... AND that her newborn female child did not survive (after giving birth) due to an abnormality within her heart. In order to provide 'risk management' advise to my boss (at the State Health Planning and Development Agency) and local Doctors, I organized a meeting with Dr. Beverly Paigan (a toxicologist from NYS DOH working on the Love Canal Site) to speak. Although I felt the meeting went well, the State Epidemiologist did not.

Today I am still in the EHS business and still run into 'Business/Government Leaders' that believe

talking about pollution, especially in our drinking water' is BAD FOR BUSINESS

Rockland County (northwest of NYC) is the smallest County (land mass outside of NYC) in NYS. Rockland does not import drinking water. TCE is not generally detected within our surface water reservoirs. Our groundwater resources (both unconfined and bedrock aquifers) are my concern.

What is the fetal heart development risk for TCE when levels at 5 ppb within our drinking water is considered 'safe'?

When you add in risk of TCE 'soil vapor intusion' (from subsurface soils and

groundwater) that is not being monitored AND personal exposures handling products, etc.... What is the

fetal heart development risk?

Web Area: Assessing and Managing Chemicals under TSCA

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/8/2018 1:38:57 PM

To: Nguyen, Nhan [Nguyen.Nhan@epa.gov]

Subject: RE: EDF blog post: Families speak out on trichloroethylene exposure: It's time for EPA to act on TCE

Thanks. Yes saw this one.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Nguyen, Nhan

Sent: Wednesday, August 08, 2018 9:29 AM **To:** Krasnic, Toni < krasnic.toni@epa.gov>

Subject: FW: EDF blog post: Families speak out on trichloroethylene exposure: It's time for EPA to act on TCE

From: Richard Denison [mailto:rdenison@edf.org]
Sent: Thursday, August 02, 2018 10:51 AM

To: rdenison@edf.org

Subject: EDF blog post: Families speak out on trichloroethylene exposure: It's time for EPA to act on TCE

Full post available at http://blogs.edf.org/health/. If you would like to opt out of receiving these emails, please <a href="https://climber.climber.com/cl

Families speak out on trichloroethylene exposure: It's time for EPA to act on TCE

By Samantha Lovell / Published: August 1, 2018

Samantha Lovell is a Project Specialist. Lindsay McCormick, is a Project Manager.

Today, families from across the country came to Washington, DC to tell lawmakers how the toxic chemical trichloroethylene (TCE) has impacted their lives.

TCE is a known human carcinogen that is toxic to the immune system and kidney, and can cause fetal heart damage – among other harmful health effects. The Environmental Protection Agency (EPA) proposed bans on high-risk uses of TCE under the newly reformed Toxic Substances Control Act (TSCA) back in December 2016 and January 2017, but under this Administration, the agency has abandoned these bans.

TCE is also one of the first 10 chemicals slated for a broad risk review by EPA under TSCA. Unfortunately, EPA plans to ignore the major exposures Americans face from TCE and other toxic chemicals released to our air, water and land – yet another sign that EPA is giving in to the chemical industry to the detriment of the public's health.

In a moving press conference today led by Sen. Tom Udall, several families shared their stories in an effort to pressure EPA to finalize the bans and take other necessary steps to protect communities across the country from TCE. Read More »

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From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/2/2017 9:56:35 AM

To: Gardner, Geraldine [Gardner.Geraldine@epa.gov]

CC: Miles, James [miles.james@epa.gov]; Garvey, Mark [Garvey.Mark@epa.gov]

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Thanks!

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Gardner, Geraldine

Sent: Tuesday, August 01, 2017 5:28 PM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

From: Miles, James

Sent: Tuesday, August 01, 2017 4:36 PM

To: Gardner, Geraldine < Gardner. Geraldine@epa.gov >

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Thanks - will you loop back to Toni?

From: Gardner, Geraldine

Sent: Tuesday, August 01, 2017 3:52 PM **To:** Miles, James miles.james@epa.gov

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

James,

Ex. 5 Deliberative Process (DP)

Geraldine

From: Miles, James

Sent: Tuesday, August 01, 2017 8:07 AM

To: Gardner, Geraldine < Gardner. Geraldine@epa.gov>

Subject: Fwd: comments changes included... RE: TCE Developmental Toxicity Study

Geraldine, can you take a look at this today? Thx

Sent from my iPhone

Begin forwarded message:

From: "Krasnic, Toni" < krasnic.toni@epa.gov > Date: August 1, 2017 at 6:52:25 AM EDT
To: "Miles, James" < miles.james@epa.gov >

Cc: "Garvey, Mark" < Garvey.Mark@epa.gov >, "Ross, Philip" < Ross.Philip@epa.gov > Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Hi James,

Mark is out until August 7. His voicemail said to contact you while he's away.

Ex. 5 Deliberative Process (DP)

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 4:26 PM

To: Krasnic, Toni < <u>krasnic.toni@epa.gov</u>>; Garvey, Mark < <u>Garvey.Mark@epa.gov</u>> **Subject:** FW: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

Toni-

Thanks for addressing my original comments so completely.

Attached is my original markup (PDF) and my current markup (Word in track changes).

Copying Mark Garvey on this so he can provide any feedback he deems warranted.

Please send me your next draft (if there are changes) or your final (if there are no additional changes).

Thanks.

Phil

Philip J. Ross
Senior Attorney
Office of General Counsel
United States Environmental Protection Agency

From: John Bell [mailto:jbell@hsia.org]
Sent: Wednesday, July 26, 2017 5:54 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com; fgraul@hsia.org

Subject: TCE Developmental Toxicity Study

Toni

Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office.

Ex. 6 Personal Privacy (PP)

am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.

Given this background, we are not confident that the study produced <u>any</u> evidence of a "substantial risk" and would be very concerned about submitting the audited draft report for fear that the information in it could be misinterpreted for the reasons described above. As we fully intend to rerun the study, are we under any time constraints which would require us to submit the results of this flawed study now? Thanks and we look forward to your response.

Regards John

John U. Bell, Ph.D.
Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201
703.875.0684
202.286.6464 (cell)
jbell@hsia.org
www.hsia.org

Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From: (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC] Sent: 1/18/2018 1:26:30 PM Wolf, Joel [Wolf.Joel@epa.gov] To: Subject: RE: Lautenberg Chemical Safety Act Ok thanks! Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984 ----Original Message----From: Wolf, Joel Sent: Thursday, January 18, 2018 8:09 AM To: Krasnic, Toni <krasnic.toni@epa.gov> Subject: RE: Lautenberg Chemical Safety Act I would reply all to Karen's original email to all of you and loop in Heidi and Tala . I don't know who tracks inquiries in the front office for Tala, if I did I would say add them and not Tala. ______ Joel Wolf Chief, Existing Chemicals Branch OCSPP/OPPT/CCD US Environmental Protection Agency WJC East, Room 4121A 202.564.0432, wolf.joel@epa.gov ----Original Message----From: Krasnic, Toni Sent: Thursday, January 18, 2018 5:59 AM To: Wolf, Joel C Subject: FW: Lautenberg Chemical Safety Act Hi Joel, Should Allison send to RAD? Does it go to Tala or the RAD TCE lead (Heidi Bethel)? Thanks, Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984 ----Original Message----From: Canavan, Sheila Sent: Wednesday, January 17, 2018 5:05 PM To: Krasnic, Toni <krasnic.toni@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov> Cc: Parsons, Doug <Parsons.Douglas@epa.gov>Subject: RE: Lautenberg Chemical Safety Act Yes this should be referred to RAD. ----Original Message----From: Krasnic, Toni Sent: Wednesday, January 17, 2018 4:15 PM To: Wolf, Joel <Wolf.Joel@epa.gov>; Canavan, Sheila <Canavan.Sheila@epa.gov> Cc: Parsons, Doug <Parsons.Douglas@epa.gov> Subject: RE: Lautenberg Chemical Safety Act Joel and Sheila, The inquiry below is about the risk from drinking water containing TCE (MCL is 5ppb https://safewater.zendesk.com/hc/en-us/articles/212075407-4-What-are-EPA-s-drinking-water-regulationsfor-trichloroethylene-), vapor intrusion (https://www.epa.gov/vaporintrusion/vapor-intrusion-superfundsites#tri), and risk from personal exposures from handling TCE.

Ex. 5 Deliberative Process (DP)

What is your preference on the response? Perhaps send to RAD?

Thanks,

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

----Original Message----From: Parsons, Doug

Sent: Wednesday, January 17, 2018 2:24 PM To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: FW: Lautenberg Chemical Safety Act

----Original Message----From: Boswell, Karen

Sent: Wednesday, January 17, 2018 12:38 PM

To: Canavan, Sheila <Canavan.Sheila@epa.gov>; Parsons, Doug <Parsons.Douglas@epa.gov>; Pierce, Alison

<Pierce.Alison@epa.gov>

Subject: FW: Lautenberg Chemical Safety Act

From: drupal_admin@epa.govOn Behalf OfDonald Wanamaker via EPA

Sent: Wednesday, January 17, 2018 12:38:12 PM (UTC-05:00) Eastern Time (US & Canada)

To: Boswell, Karen

Subject: Lautenberg Chemical Safety Act

Submitted on 01/17/2018 12:38PM

Submitted values are:

Name: Donald Wanamaker

Subject: Lautenberg Chemical Safety Act

Email: dwanamaker@emlweb.com

Comments:

As an Environmental Health Consultant for the past four decades, the human health risk of exposure to Trichloroethylene (TCE) has not diminished. In

1978 I attended a State Legislature Hearing (in Maine) regarding the McKin Solvent Recovery Site (in Grey, Maine). I listened as a mother (Kathy Hines) testified that her private well water was contaminated... AND that her newborn female child did not survive (after giving birth) due to an abnormality within her heart. In order to provide 'risk management' advise to my boss (at the State Health Planning and Development Agency) and local Doctors, I organized a meeting with Dr. Beverly Paigan (a toxicologist from NYS DOH working on the Love Canal Site) to speak. Although I felt the meeting went well, the State Epidemiologist did not.

Today I am still in the EHS business and still run into 'Business/Government Leaders' that believe 'talking about pollution, especially in our drinking water' is BAD FOR BUSINESS.

Rockland County (northwest of NYC) is the smallest County (land mass outside of NYC) in NYS. Rockland does not import drinking water. TCE is not generally detected within our surface water reservoirs. Our groundwater resources (both unconfined and bedrock aquifers) are my concern.

What is the fetal heart development risk for TCE when levels at 5 ppb within our drinking water is considered 'safe'?

When you add in risk of TCE 'soil vapor intusion' (from subsurface soils and groundwater) that is not being monitored AND personal exposures handling products, etc.... What is the

fetal heart development risk?

Web Area: Assessing and Managing Chemicals under TSCA

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/1/2017 12:08:27 PM

To: Miles, James [miles.james@epa.gov]

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Thanks James!

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Miles, James

Sent: Tuesday, August 01, 2017 8:07 AM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Garvey, Mark < Garvey. Mark@epa.gov>; Ross, Philip < Ross. Philip@epa.gov> **Subject:** Re: comments changes included... RE: TCE Developmental Toxicity Study

Thanks Toni. I'm having another attorney here take a look.

Sent from my iPhone

On Aug 1, 2017, at 6:52 AM, Krasnic, Toni krasnic.toni@epa.gov> wrote:

Hi James,

Mark is out until August 7. His voicemail said to contact you while he's away.

Ex. 5 Deliberative Process (DP)

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 4:26 PM

To: Krasnic, Toni < <u>krasnic.toni@epa.gov</u>>; Garvey, Mark < <u>Garvey.Mark@epa.gov</u>> **Subject:** FW: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

Toni—
Thanks for addressing my original comments so completely.
Attached is my original markup (PDF) and my current markup (Word in track changes).
Copying Mark Garvey on this so he can provide any feedback he deems warranted.
Please send me your next draft (if there are changes) or your final (if there are no additional changes).
Thanks.
Phil
Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637
From: John Bell [mailto:jbell@hsia.org] Sent: Wednesday, July 26, 2017 5:54 PM To: Krasnic, Toni < krasnic.toni@epa.gov> Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com>; fgraul@hsia.org Subject: TCE Developmental Toxicity Study
Toni
Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office. Ex. 6 Personal Privacy (PP) I am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.
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Regards John

Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201
703.875.0684
202.286.6464 (cell)
jbell@hsia.org
www.hsia.org

<207 7 28 pjr comments changes 2017-07-28_HSIA Redraft Krasnic OPPT.docx>

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/1/2017 10:52:25 AM

To: Miles, James [miles.james@epa.gov]

CC: Garvey, Mark [Garvey.Mark@epa.gov]; Ross, Philip [Ross.Philip@epa.gov]

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Attachments: 207 7 28 pjr comments changes 2017-07-28 HSIA Redraft Krasnic OPPT.docx

Hi James,

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Ex. 5 Deliberative Process (DP)

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Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 4:26 PM

To: Krasnic, Toni <krasnic.toni@epa.gov>; Garvey, Mark <Garvey.Mark@epa.gov> **Subject:** FW: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

Toni-

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Attached is my original markup (PDF) and my current markup (Word in track changes).

Copying Mark Garvey on this so he can provide any feedback he deems warranted.

Please send me your next draft (if there are changes) or your final (if there are no additional changes).

Thanks.

Phil

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637

From: John Bell [mailto:jbell@hsia.org] **Sent:** Wednesday, July 26, 2017 5:54 PM **To:** Krasnic, Toni krasnic,toni@epa.gov

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com>; fgraul@hsia.org

Subject: TCE Developmental Toxicity Study

Toni

Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office.

Ex. 6 Personal Privacy (PP)

I am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.

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Regards John

John U. Bell, Ph.D.
Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201
703.875.0684
202.286.6464 (cell)
jbell@hsia.org
www.hsia.org

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 3/7/2019 5:23:49 PM

To: Wolf, Joel [Wolf.Joel@epa.gov]
CC: Lloyd, Tyler [Lloyd.Tyler@epa.gov]

Subject: FW: status of ATSDR PERC and TCE assessments

FYI - See interesting new development with ATSDR on TCE and PERC.

Ex. 5 Deliberative Process (DP)

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Euling, Susan

Sent: Wednesday, March 06, 2019 12:01 PM

To: Benedict, Rae T. (ATSDR/DTHHS/ETB) < hvb3@cdc.gov>

Cc: Kapuscinski, Rich <Kapuscinski.Rich@epa.gov>; Bethel, Heidi <Bethel.Heidi@epa.gov>; Krasnic, Toni

<krasnic.toni@epa.gov>; Jacobs, Keith <jacobs.keith@epa.gov>

Subject: RE: status of ATSDR PERC and TCE assessments

Hi Rae,

Thank you for the information and for returning my call!

Ex. 5 Deliberative Process (DP)

Some additional questions:

- Would it be possible for the TCE workgroup to review your Tox Profile at this time?
- Do you know which offices (or names) at EPA reviewed the TCE document in 2015?
- Typically, ATSDR Tox Profiles include the derivation of MRLs. Did the toxicity data include the cardiac developmental effects studies? Were these studies used as the basis for an MRL? Is the epidemiology data the basis for an MRL?

Thanks so much for your help.

Sue

Susan Y. Euling, Ph.D.
Biologist
Office of Children's Health Protection (MC 1107T)
Regulatory Support & Science Policy Division
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-566-2717

From: Benedict, Rae T. (ATSDR/DTHHS/ETB) < hvb3@cdc.gov>

Sent: Tuesday, March 05, 2019 12:28 PM
To: Euling, Susan < <u>Euling</u>, Susan@epa.gov>

Cc: Kapuscinski, Rich < Kapuscinski.Rich@epa.gov>; Bethel, Heidi < Bethel.Heidi@epa.gov>; Krasnic, Toni

<krasnic.toni@epa.gov>; Jacobs, Keith <jacobs.keith@epa.gov>

Subject: RE: status of ATSDR PERC and TCE assessments

Hi Susan,

That is correct, the TCE profile has been in development for about 10 years. Interagency review happened ages ago. I am actually the PCE Chemical Manager so I could answer the question that came in since the two of them seem to be tied to each other (as far as getting them "published").

I or my boss, Henry Abadin, will give you a call to find out more about your concerns or desires.

Thank you,

Rae ATSDR DTHHS

Environmental Toxicology Branch

Phone: 404.639.2370 Email: <u>hvb3@cdc.gov</u> Telework: Monday

Please note: This message may contain information that is important for you to know, but is not intended for public use. Please do not quote from this e-mail, or share any of the information contained in this e-mail with other persons, except with express consent of the sender. If you have received this message in error, please advise the sender by reply e-mail and delete this message immediately. Thank you for your cooperation.

From: Euling, Susan < Euling.Susan@epa.gov Sent: Tuesday, March 5, 2019 12:09 PM

To: Benedict, Rae T. (ATSDR/DTHHS/ETB) < hvb3@cdc.gov>

Cc: Kapuscinski, Rich <Kapuscinski, Rich@epa.gov>; Bethel, Heidi <Bethel, Heidi@epa.gov>; Krasnic, Toni

<krasnic.toni@epa.gov>; Jacobs, Keith <jacobs.keith@epa.gov>

Subject: status of ATSDR PERC and TCE assessments

Dear Rai Benedict,

I received this email (below) from you regarding ATSDR's intention to publish a PERC and TCE Toxicological Profile in 2019. As you know, EPA's toxics program is currently performing a risk evaluation on TCE under amended TSCA (https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluation-trichloroethylene-tce-0). The Office of Children's Health Protection is interested in both the PERC and TCE Toxicological Profiles. Could you let me know the timing of the Tox Profiles, and in particular, when you will have an interagency review?

I also left you a voicemail with this request. Feel free to call me at 202-566-2717.

Thanks,

Sue

Susan Y. Euling, Ph.D.

Biologist
Office of Children's Health Protection (MC 1107T)
Regulatory Support & Science Policy Division
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
202-566-2717

Dear Ric Kapuscinski:

Thank you for contacting ATSDR with your inquiry.

Ex. 5 Deliberative Process (DP)

Rae T. Benedict, MS, PhO

Agency for Toxic Substances and Disease Registry Division of Toxicology and Human Health Sciences Environmental Toxicology Branch

Phone: 404.639.2370 Email: hvb3@cdc.gov Telework: Monday

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 7/28/2017 7:49:31 PM

To: Ross, Philip [Ross.Philip@epa.gov]

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Attachments: 2017 7 28 pjr comments changes TCE Developmental Toxisity Study TSCA 8e Draft Krasnic OPPT.pdf; 2017-07-

28 HSIA.docx

Thanks Phil!

Attached please find the revised draft. I didn't track changes since it almost a complete rewrite. I think this revised draft addressed all your comments.

The OECA 8(e) counsel is Mark Garvey. I'll send the response to him after your review or feel free to include him directly.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 2:00 PM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Subject: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

Toni-

As requested. Please see attached and notes throughout.

Happy to discuss.

Please send me your next draft.

Thanks!

Phil

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637 From: Ross, Philip

Sent: Thursday, July 27, 2017 3:15 PM
To: Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>
Subject: RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

I'll look it over and be in touch—most likely next week.

Thanks.

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637

From: Krasnic, Toni

Sent: Thursday, July 27, 2017 3:09 PM **To:** Ross, Philip < <u>Ross. Philip@epa.gov</u>>

Subject: FW: TCE Developmental Toxicity Study

Hi Phil,

HSIA worked on this study for few months and spent a lot of money on it, only to determine later that it wasn't done properly. I've informed them that all studies showing substantial risk information are reportable, even if not done properly.

This is their response (see below).

Ex. 5 Deliberative Process (DP)

Thanks for reviewing the draft response.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: John Bell [mailto:jbell@hsia.org]
Sent: Wednesday, July 26, 2017 5:54 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Caffey Norman (Squire Patton Boggs) < <u>Caffey.Norman@squirepb.com</u>>; <u>fgraul@hsia.org</u> **Subject:** TCE Developmental Toxicity Study

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Subject: FW: Lautenberg Chemical Safety Act

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To: Boswell, Karen

Subject: Lautenberg Chemical Safety Act

Submitted on 01/17/2018 12:38PM

Submitted values are:

Name: Donald Wanamaker

Subject: Lautenberg Chemical Safety Act

Email: dwanamaker@emlweb.com

Comments:

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1978 I attended a State Legislature Hearing (in Maine) regarding the McKin Solvent Recovery Site (in Grey, Maine). I listened as a mother (Kathy Hines) testified that her private well water was contaminated... AND that her newborn female child did not survive (after giving birth) due to an abnormality within her heart. In order to provide 'risk management' advise to my boss (at the State Health Planning and Development Agency) and local Doctors, I organized a meeting with Dr. Beverly Paigan (a toxicologist from NYS DOH working on the Love Canal Site) to speak. Although I felt the meeting went well, the State Epidemiologist did not.

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Rockland County (northwest of NYC) is the smallest County (land mass outside of NYC) in NYS. Rockland does not import drinking water. TCE is not generally detected within our surface water reservoirs. Our groundwater resources (both unconfined and bedrock aquifers) are my concern.

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Web Area: Assessing and Managing Chemicals under TSCA

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(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 3/7/2019 4:56:03 PM

To: Morris, Jeff [Morris.Jeff@epa.gov]

CC: Wolf, Joel [Wolf.Joel@epa.gov]

Subject: FW: ARA meeting - J. Bus presentation

Attachments: ATT00001.txt; JBus ARA Workshop TCE DW Cardiac Malformation 2-26-2019.pdf

Hi Jeff,

We've already added the final study to the docket: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0737-0120.

I hesitate to add other summaries, especially those not presented to EPA, as everyone will want their summaries added as well. If you'd like me to add it, please let me know.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Norman, Caffey <caffey.norman@squirepb.com>

Sent: Wednesday, March 06, 2019 4:30 PM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Beck, Nancy <Beck.Nancy@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>

Subject: FW: ARA meeting - J. Bus presentation

Thought you might want to add this to the docket if appropriate. Good summary of study.



W. Caffey Norman Partner Squire Patton Boggs (US) LLP 2550 M Street, NW Washington, DC 20037

T +1 202 457 5270 F +1 202 457 6315 M +1 202 460 9495

From: Christopher Bevan <cibevan@mindspring.com>

Date: Wednesday, March 6, 2019 at 12:16 PM

To: Bob Budinsky <RABudinsky@dow.com>, John DeSesso <Jdesesso@exponent.com>, Laurie Haws

<lhaws@toxstrategies.com>, Paul Jean <pajean@olinbc.com>, Karen Knutson

<<u>Karen.Knutson@westlake.com</u>>, Caffey Norman <<u>caffey.norman@squirepb.com</u>>

Subject: ARA meeting - J. Bus presentation

Attached are the slides from Jim Bus' presentation of the TCE heart defect developmental study at the Alliance for Risk Assessment workshop last week.

Regards, Chris

Christopher Bevan PhD, DABT Director, Scientific Programs Halogenated Solvents Industry Alliance, Inc. 3033 Wilson Boulevard, Suite 700 Arlington, VA 22201 Phone: 703.875.0684

Cell: 513.646.1468 e-mail: <u>cbevan@hsia.org</u>

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#US

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 7/19/2017 7:23:54 PM

To: Chun, Melissa [Chun.Melissa@epa.gov]; Wheeler, Cindy [Wheeler.Cindy@epa.gov]

CC: Wolf, Joel [Wolf.Joel@epa.gov]
Subject: RE: Request for Correction

Attachments: EPA-HQ-OPPT-2016-0387-0698 HSIA.pdf; EPA-HQ-OPPT-2016-0163-0178 HSIA3.pdf

Hi Melissa,

Attached are HSIA's comments submitted during the TCE1 and TCE2 rulemaking period.

Here are also links to the documents in the dockets:

- EPA-HQ-OPPT-2016-0163-0178
- EPA-HQ-OPPT-2016-0387-0698

HSIA also raised these comments during <u>SBAR Panel</u>, at the SBA Environmental Roundtable on March 10, 2017, and at meeting with DAA Nancy Beck on July 12, 2017.

Ex. 5 Deliberative Process (DP)

Let me know if you need anything else.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Chun, Melissa

Sent: Wednesday, July 19, 2017 12:38 PM
To: Wheeler, Cindy < Wheeler.Cindy@epa.gov>
Cc: Krasnic, Toni < krasnic.toni@epa.gov>
Subject: RE: Request for Correction

Hi Cindy and Toni,

HSIA has submitted a request for reconsideration for the request for correction that we denied. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Has

HSIA raised these comments in another forum, e.g., a public meeting

Let me know.

Thanks!

-Melissa

Melissa L Chun | US EPA | Regulatory Coordination Staff | Office of Chemical Safety and Pollution Prevention | 1200 Pennsylvania Ave., NW | William Jefferson Clinton Building East Room 3425E, Mail Code 7101M | Washington DC 20460 | phone: (202) 564-1605

From: Wheeler, Cindy

Sent: Wednesday, July 19, 2017 12:29 PM
To: Chun, Melissa < Chun. Melissa@epa.gov>
Cc: Krasnic, Toni < krasnic.toni@epa.gov>

Subject: Request for Correction

Melissa, I apologize

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Anyway, Toni is basically taking over the TCE vapor degreasing project from me, and I've moved on (?) to other things. I understood from your voicemail that we had received some sort of request for correction that pertains to that project, and that you were looking for info on the comments received. I know Toni has been reviewing them, he can probably brief you on the basic substance of them.

Cindy Wheeler
Chemical Control Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
(202) 566-0484

Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From:

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/3/2017 3:55:00 PM

Ross, Philip [Ross.Philip@epa.gov] To:

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

No, I sent at 11am because I have to leave at 12pm. I'll let you know if I hear back.

Thanks,

Toni Krasnic **Existing Chemicals Branch** EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Thursday, August 03, 2017 11:44 AM To: Krasnic, Toni <krasnic.toni@epa.gov>

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative **Enforcement Sensitive** Privileged and Confidential

Do Not Release

Ex. 6 Personal Privacy (PP)

Are you waiting to hear from me?

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637

From: Krasnic, Toni

Sent: Thursday, August 03, 2017 6:48 AM To: Ross, Philip < Ross. Philip@epa.gov>

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Hi Phil,

I've accepted all your edits and OECA has cleared the response.

Final response is attached. I plan on sending the response later this morning.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Gardner, Geraldine

Sent: Tuesday, August 01, 2017 5:28 PM **To:** Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

From: Miles, James

Sent: Tuesday, August 01, 2017 4:36 PM

To: Gardner, Geraldine < Gardner.Geraldine@epa.gov>

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Thanks – will you loop back to Toni?

From: Gardner, Geraldine

Sent: Tuesday, August 01, 2017 3:52 PM **To:** Miles, James miles.james@epa.gov

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

James,

Just wanted to let you know that I looked at the attachment and I think it contains some good advice. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

he company should consider a "For Your Information"

submission as a precaution. This option is explained in EPA's TSCA section 8(e) guidance documents, found on the internet.

Geraldine

From: Miles, James

Sent: Tuesday, August 01, 2017 8:07 AM

To: Gardner, Geraldine < Gardner. Geraldine@epa.gov>

Subject: Fwd: comments changes included... RE: TCE Developmental Toxicity Study

Geraldine, can you take a look at this today? Thx

Sent from my iPhone

Begin forwarded message:

From: "Krasnic, Toni" < krasnic.toni@epa.gov > Date: August 1, 2017 at 6:52:25 AM EDT To: "Miles, James" < miles.james@epa.gov >

Cc: "Garvey, Mark" < Garvey.Mark@epa.gov>, "Ross, Philip" < Ross.Philip@epa.gov> Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Hi James,

Ex. 6 Personal Privacy (PP) His voicemail said to contact you while he's away.

Could you please check the attached response for any enforcement concerns? There *might* be a TSCA 8(e) violation if they don't submit this study.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 4:26 PM

To: Krasnic, Toni < <u>krasnic.toni@epa.gov</u>>; Garvey, Mark < <u>Garvey.Mark@epa.gov</u>> **Subject:** FW: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative Enforcement Sensitive Privileged and Confidential Do Not Release

Toni-

Thanks for addressing my original comments so completely.

Attached is my original markup (PDF) and my current markup (Word in track changes).

Copying Mark Garvey on this so he can provide any feedback he deems warranted.

Please send me your next draft (if there are changes) or your final (if there are no additional changes).

Thanks.

Phil

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637

From: John Bell [mailto:jbell@hsia.org]
Sent: Wednesday, July 26, 2017 5:54 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com; fgraul@hsia.org

Subject: TCE Developmental Toxicity Study

Toni

Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) | am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.

Given this background, we are not confident that the study produced <u>any</u> evidence of a "substantial risk" and would be very concerned about submitting the audited draft report for fear that the information in it could be misinterpreted for the reasons described above. As we fully intend to rerun the study, are we under any time constraints which would require us to submit the results of this flawed study now? Thanks and we look forward to your response.

Regards	ò
lohn	

John U. Bell, Ph.D.
Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201
703.875.0684
202.286.6464 (cell)
jbell@hsia.org
www.hsia.org

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 8/3/2017 10:47:36 AM

To: Ross, Philip [Ross.Philip@epa.gov]

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Attachments: 2017-07-28_HSIA_FINAL.docx

Hi Phil,

I've accepted all your edits and OECA has cleared the response.

Final response is attached. I plan on sending the response later this morning.

Thanks.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Gardner, Geraldine

Sent: Tuesday, August 01, 2017 5:28 PM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

From: Miles, James

Sent: Tuesday, August 01, 2017 4:36 PM

To: Gardner, Geraldine < <u>Gardner.Geraldine@epa.gov</u>>

Subject: RE: comments changes included... RE: TCE Developmental Toxicity Study

Thanks – will you loop back to Toni?

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Sent: Tuesday, August 01, 2017 3:52 PM **To:** Miles, James < <u>miles.james@epa.gov</u>>

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James,

Just wanted to let you know that I looked at the attachment and I think it contains some good advice.

Ex. 5 Deliberative Process (DP)

the company should consider a "For Your Information"
submission as a precaution. This option is explained in EPA's TSCA section 8(e) guidance documents, found on the internet.

Geraldine

From: Miles, James

Sent: Tuesday, August 01, 2017 8:07 AM

To: Gardner, Geraldine < Gardner. Geraldine@epa.gov>

Subject: Fwd: comments changes included... RE: TCE Developmental Toxicity Study

Geraldine, can you take a look at this today? Thx

Sent from my iPhone

Begin forwarded message:

From: "Krasnic, Toni" < krasnic.toni@epa.gov> Date: August 1, 2017 at 6:52:25 AM EDT To: "Miles, James" < miles.james@epa.gov>

Cc: "Garvey, Mark" < Garvey. Mark@epa.gov>, "Ross, Philip" < Ross. Philip@epa.gov> Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Hi James,

Mark is out until August 7. His voicemail said to contact you while he's away.

Could you please check the attached response for any enforcement concerns? Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks,

Toni Krasnic **Existing Chemicals Branch** EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

From: Ross, Philip

Sent: Friday, July 28, 2017 4:26 PM

To: Krasnic, Toni < krasnic.toni@epa.gov>; Garvey, Mark < Garvey.Mark@epa.gov> Subject: FW: comments changes included... RE: TCE Developmental Toxicity Study

Attorney Client Communication Attorney Work Product Deliberative **Enforcement Sensitive** Privileged and Confidential Do Not Release

Toni-

Thanks for addressing my original comments so completely.

Attached is my original markup (PDF) and my current markup (Word in track changes).

Copying Mark Garvey on this so he can provide any feedback he deems warranted.

Please send me your next draft (if there are changes) or your final (if there are no additional changes).

Thanks.

Phil

Philip J. Ross Senior Attorney Office of General Counsel United States Environmental Protection Agency (202) 564-5637

From: John Bell [mailto:jbell@hsia.org]
Sent: Wednesday, July 26, 2017 5:54 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Caffey Norman (Squire Patton Boggs) < Caffey.Norman@squirepb.com>; fgraul@hsia.org

Subject: TCE Developmental Toxicity Study

Toni

Caffey Norman asked me to follow up with you regarding whether or not the draft results from our TCE drinking water study needed to be submitted to your office. He is currently out of the country and, as I was on vacation last week, I am trying to come up to speed on the issues you discussed. As I'm sure you are aware by now, CRL ran into problems with achievement of the target drinking water TCE concentrations during the study, invalidating the results. We are currently working with them to ensure that they have a workable procedure in place which will ensure that target concentrations can be reliably achieved (± 10% of target). That process begins tomorrow and should be completed next Monday. Once a suitable procedure is in place, we will work with CRL to reschedule the study as soon as possible. CRL also identified a problem within their breeding animals during the time our study was run, resulting in an unexpected spontaneous increase in fetal interventricular septal defects (IVSDs) across several developmental studies. IVSDs were essentially the only fetal effects seen in our study, raising serious questions about the role of TCE.

Given this background, we are not confident that the study produced <u>any</u> evidence of a "substantial risk" and would be very concerned about submitting the audited draft report for fear that the information in it could be misinterpreted for the reasons described above. As we fully intend to rerun the study, are we under any time constraints which would require us to submit the results of this flawed study now? Thanks and we look forward to your response.

Regards John

John U. Bell, Ph.D.
Director, Scientific Programs
Halogenated Solvents Industry Alliance
3033 Wilson Boulevard
Suite 700
Arlington, VA 22201
703.875.0684
202.286.6464 (cell)
jbell@hsia.org
www.hsia.org

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 7/25/2018 3:58:06 PM

To: Camacho, Iris [Camacho.Iris@epa.gov]; Nhan Nguyen [Nguyen.Nhan@epa.gov]

CC: Wolf, Joel [Wolf.Joel@epa.gov]

Subject: FW: TCE study rerun

Attachments: 00459506 Draft Protocol - Updated ver.PSC 20Jun2018.doc

FYI

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Krasnic, Toni

Sent: Friday, June 22, 2018 1:51 PM

To: Jacobs, Keith < jacobs.keith@epa.gov>; Bethel, Heidi < Bethel.Heidi@epa.gov>

Subject: FW: TCE study rerun

HSIA sent us the protocol – please see attached.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Christopher Bevan [mailto:cjbevan@mindspring.com]

Sent: Friday, June 22, 2018 11:27 AM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Cc: Christopher Bevan - CJB Consulting LLC (cbevan@hsia.org) <cbevan@hsia.org>; Norman, Caffey

<<u>caffey.norman@squirepb.com</u>> **Subject:** Re: TCE study rerun

Dear Toni,

Attached is the final draft protocol for the re-run of the TCE developmental study. The protocol has been sent to us from the CRL Ashland study director in track mode; the changes are mainly the result of a feasibility study that HSIA ran earlier this month. The aim of the feasibility study was to ensure that the dosing solutions could be prepared consistently on a daily basis and to determine whether TCE could be measured in the blood of the dosed pregnant rats. We also wanted to know how much TCE loss would occur from the drinking water bottles over the 24-hour period in the animal cages. We were unable to measure TCE in the blood of pregnant rats given 0.25 and 1,000 ppm TCE in the drinking water; thus, we have removed this measurement from the protocol of the developmental study. We will be providing you with the all of the results of the feasibility in a separate communications. Please let me know if you have any questions.

Kind regards,

Chris

Christopher Bevan PhD DABT Director, Science Programs Halogenated Solvents Industry Alliance, Inc. 3033 Wilson Boulevard, Suite 700 Arlington, VA 22201

Phone: 703.875.0684 Cell: 513.646.1468 e-mail: <u>cbevan@hsia.org</u>

From: "Norman, Caffey" < caffey.norman@squirepb.com>

Date: Thursday, June 21, 2018 at 2:38 PM **To:** "Krasnic, Toni" < krasnic.toni@epa.gov>

Cc: "Christopher Bevan - CJB Consulting LLC (cbevan@hsia.org

Subject: RE: TCE study rerun

Yes, I was informed that we just got a redlined 'final' draft from CRL. As soon as Chris Bevan deems it satisfactory (next few days) he will pass it along to you.

From: Krasnic, Toni < krasnic.toni@epa.gov>
Sent: Thursday, June 21, 2018 2:02 PM

To: Norman, Caffey <caffey.norman@squirepb.com>

Subject: TCE study rerun

Dear Caffey,

Thank you for the update on the TCE study rerun. We're looking forward to receiving the results once they're available in September-October.

As per our discussion yesterday, we'd also like to request an updated protocol of the study, if available.

Sincerely,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Norman, Caffey [mailto:caffey.norman@squirepb.com]

Sent: Tuesday, May 29, 2018 3:48 PM
To: Morris, Jeff < Morris.Jeff@epa.gov >
Cc: Beck, Nancy < Beck.Nancy@epa.gov >

Subject: FW: Your Comment Submitted on Regulations.gov (ID: EPA-HQ-OA-2018-0259-0001)

Hi Nancy and Jeff,

Just wanted you to have this comment, which was submitted to the transparency proposal docket. I tried to put it in the TCE TSCA dockets (EPA-HQ-OPPT-2016-0387; EPA-HQ-OPPT-2016-0737; EPA-HQ-OPPT-2016-0163) but they are closed. Jeff, can you get it in?

This is the latest info available on the TCE study rerun. We expect to have an article on the difficulties of administration and how they have been addressed to submit for publication as soon as CRL concludes a preliminary study. Then, as noted, we should have results to share in September-October. W. Caffey Norman Partner Squire Patton Boggs (US) LLP 2550 M Street, NW Washington, DC 20037 T +1 202 457 5270 F +1 202 457 6315 M +1 202 460 9495
47 Offices in 20 Countries
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#US

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 6/9/2017 6:32:45 PM

To: Bethel, Heidi [Bethel.Heidi@epa.gov]

Subject: RE: CCD and NPCD comments on Scope documents **Attachments**: TCE_TSCAScope_Intra-agency_06-05-17_CCD_v2.docx

Yes, see the document I sent you this morning (attached again to this email).

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Bethel, Heidi

Sent: Friday, June 09, 2017 2:23 PM **To:** Krasnic, Toni <krasnic.toni@epa.gov>

Subject: RE: CCD and NPCD comments on Scope documents

There is a note on the reg table from OW that says to conform the TCE reg table with the reg table in NMP. Was that done?

From: Krasnic, Toni

Sent: Friday, June 09, 2017 1:45 PM
To: Bethel, Heidi < Bethel. Heidi@epa.gov>

Subject: RE: CCD and NPCD comments on Scope documents

Thanks Heidi and good luck! Almost over...for now.

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Bethel, Heidi

Sent: Friday, June 09, 2017 1:44 PM **To:** Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>

Subject: RE: CCD and NPCD comments on Scope documents

Got it! Thanks! We added color to the table and a footnote and some additional text in this section. It's crazy town around here. I've got two hours to finish the rest of the intra-agency edits and no time to check anything over, of course! Happy Friday!

From: Krasnic, Toni

Sent: Thursday, June 08, 2017 8:07 AM **To:** Bethel, Heidi < Bethel, Heidi@epa.gov>

Subject: RE: CCD and NPCD comments on Scope documents

H Heidi,

I think adding a footnote would help. Please see attached revisions with footnotes text (in comments).

Also search document for "*" for one additional change I had.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Bethel, Heidi

Sent: Thursday, June 08, 2017 6:47 AM **To:** Krasnic, Toni <<u>krasnic.toni@epa.gov</u>>

Subject: RE: CCD and NPCD comments on Scope documents

Thanks Toni. I made your changes in the document or sent you notes back on them. What was the intent of your comment in the use table where you identified previously assessed uses. Were you thinking that they need a footnote to identify them as something previously assessed?

Heidi

From: Krasnic, Toni

Sent: Thursday, June 08, 2017 6:07 AM **To:** Bethel, Heidi < Bethel, Heidi@epa.gov>

Subject: FW: CCD and NPCD comments on Scope documents

Hi Heidi,

During DD review of scope documents, we were asked my Maria and Brian to review the documents and submit additional edits/comments. The summary doc with comments is attached. Niva sent this to Tala last evening and I'm forwarding to you as FYI.

I've also already sent you the TCE mark-up.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Kramek, Niva

Sent: Wednesday, June 07, 2017 7:24 PM **To:** Henry, Tala < <u>Henry, Tala@epa.gov</u>>

Cc: Doa, Maria <<u>Doa.Maria@epa.gov</u>>; Symmes, Brian <<u>Symmes.Brian@epa.gov</u>>; Wolf, Joel <<u>Wolf.Joel@epa.gov</u>>;

Winchester, Erik < Winchester. Erik@epa.gov>; Passe, Loraine < Passe. Loraine@epa.gov>; Courtnage, Robert

<Courtnage.Robert@EPA.GOV>

Subject: CCD and NPCD comments on Scope documents

Hi Tala -

Maria and Brian asked us to send to you the consolidated CCD and NPCD comments on the scope document, following our divisions' review and DD discussions. Please note that Brian may send additional comments.

Attached please find:

- Summary table of 1) top issues, 2) secondary issues and edits, and 3) issues specific to asbestos
- **Markups** of the scope documents reflecting the top issues as well as staff suggestions for revisions for each chemical-specific scope document
 - Please note that the top issues in the summary table are captured in carbon tet, with a recommendation that they be replicated across the scope documents
 - o Please also note that 1,4-dioxane is not included due to no edits needed specific to this chemical

Thank you for the opportunity to comment. We look forward to seeing the final product, and I'm sure you are looking forward to the end of this part.

Thanks -

Niva

Niva Kramek
Existing Chemicals Branch,
Chemical Control Division
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
202-564-4830
Kramek,niva@epa.gov

From: Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 11/2/2016 4:35:41 PM

To: Anderson, Steve [Anderson.Steve@epa.gov]

Subject: FW: TCE SNUN

Attachments: SCIGRIP4 amazon.PNG; SCIGRIP3 amazon.PNG; SDS SCIGRIP 3.pdf; SDS SCIGRIP 4.pdf; SNUN Cover Letter.pdf;

SNUN.pdf; Consumer Use.pdf; Process Description.pdf; 2016-04-08 TCE SNUR FINAL.pdf; 2015-08-07 80 FR

47441 NPRM.pdf

Hi Steve,

We just got a SNUN for two products containing TCE. The new use is "processing TCE for use in consumer products." Please see attached (all docs are non-CBI).

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Krasnic, Toni

Sent: Wednesday, November 02, 2016 12:28 PM **To:** Moss, Kenneth < Moss. Kenneth@epa.gov>

Cc: Kramek, Niva <kramek.niva@epa.gov>; Lloyd, Tyler <Lloyd.Tyler@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>;

Wheeler, Cindy < Wheeler. Cindy@epa.gov>; Schweer, Greg < Schweer. Greg@epa.gov>

Subject: RE: TCE SNUN

Hi Ken,

Ex. 5 Deliberative Process (DP)

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Moss, Kenneth

Sent: Monday, October 31, 2016 3:53 PM

To: Lloyd, Tyler <<u>Lloyd.Tyler@epa.gov</u>>; Scarano, Louis <<u>Scarano.Louis@epa.gov</u>>; Roberts, Justin

<<u>Roberts.Justin@epa.gov</u>>; Lynch, David <<u>Lynch.David@epa.gov</u>>

Cc: Wolf, Joel < Wolf.Joel@epa.gov >; Schechter, Kathryn < Schechter, Kathryn@epa.gov >; Schweer, Greg

<<u>Schweer.Greg@epa.gov</u>>; Allison, Rose <<u>Allison.Rose@epa.gov</u>>

Subject: RE: TCE SNUN

To follow up - Thanks Tyler for the background on this, and **Ex. 5 Deliberative Process (DP)**

I am adding in David, Justin and Gino as people who worked on the original workplan risk assessment, as a heads up to new chems folks.

Again, this is not CBI. I have put everything on that and is available in CDX as S-17-1.

K

Kenneth Moss
USEPA
Team Leader, New Chemicals Program
Office of Pollution Prevention and Toxics (7405M)
WJC EPA East Building, room 4133C
1201 Constitution Ave., NW
Phone: 202-564-9232, Fax: 202-564-9490

From: Moss, Kenneth

Sent: Monday, October 31, 2016 3:32 PM **To:** Lloyd, Tyler < <u>Lloyd.Tyler@epa.gov</u>>

Cc: Wolf, Joel < Wolf.Joel@epa.gov >; Schechter, Kathryn < Schechter.Kathryn@epa.gov >; Schweer, Greg

<Schweer.Greg@epa.gov>

Subject: TCE SNUN

Hi Tyler -

I created a folder [EX.5 Deliberative Process (DP)] or a (non-CBI) SNUN we just received in response to the April 8 TCE SNUR. It has been received as a regular "new chemicals" notification, but not sure how to handle from here.

Ken

Kenneth Moss USEPA Team Leader, New Chemicals Program Office of Pollution Prevention and Toxics (7405M) WJC EPA East Building, room 4133C 1201 Constitution Ave., NW Phone: 202-564-9232, Fax: 202-564-9490

Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From: (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC] Sent: 2/15/2017 5:34:17 PM Wolf, Joel [Wolf.Joel@epa.gov] To: Subject: RE: TCE Attachments: Shanen_TCE_2017-02-15_v2.docx Thanks Joel! Sheila asked that we run it by Maria. Attached is the clean version. Thanks, Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984 ----Original Message----From: Wolf, Joel Sent: Wednesday, February 15, 2017 12:13 PM To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: RE: TCE Hi Toni, A few suggested edits. Thanks for drafting. Joel Wolf Chief, Existing Chemicals Branch OCSPP/OPPT/CCD US Environmental Protection Agency WJC East, Room 4121A 202.564.0432, wolf.joel@epa.gov ----Original Message----From: Krasnic, Toni Sent: Wednesday, February 15, 2017 9:47 AM To: Wolf, Joel <Wolf.Joel@epa.gov> Subject: RE: TCE Hi Joel, Attached please find a draft response. Thanks, Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984 ----Original Message----From: Canavan, Sheila Sent: Tuesday, February 14, 2017 8:39 AM
To: Wolf, Joel <wolf.Joel@epa.gov>; Krasnic, Toni <krasnic.toni@epa.gov> Cc: Kramék, Niva <kramek.niva@epa.gov>Subject: RE: TCE Please respond directly and let her know that you placed her comment in the docket. Also, please show Maria. Thanks. ----Original Message----From: Wolf, Joel Sent: Tuesday, February 14, 2017 8:06 AM To: Krasnic, Toni <krasnic.toni@epa.gov>; Canavan, Sheila <Canavan.Sheila@epa.gov> Cc: Kramek, Niva <kramek.niva@epa.gov> Subject: RE: TCE

Hi Sheila,

Drupal received basically a statement about TCE. Is your preference that we put this into the docket or respond directly?

Ex. 5 Deliberative Process (DP)

Let us know. Thanks, Joel

Joel Wolf Chief, Existing Chemicals Branch OCSPP/OPPT/CCD US Environmental Protection Agency WJC East, Room 4121A 202.564.0432, wolf.joel@epa.gov ----Original Message----From: Krasnic, Toni

Sent: Friday, February 10, 2017 5:52 AM To: Canavan, Sheila <Canavan.Sheila@epa.gov>

Cc: Wolf, Joel <wolf.Joel@epa.gov>; Kramek, Niva <kramek.niva@epa.gov>

Subject: FW: TCE

Hi Sheila,

Please see the below message from Shanen, a mother who blames TCE for her deceased daughter and 2 undeveloped babies.

Do I need to respond to this email? If so, should we also ask her to submit her comments to the TCE rulemaking docket?

Thanks,

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

----Original Message----From: Boswell, Karen

Sent: Thursday, February 09, 2017 10:12 PM To: Krasnic, Toni <krasnic.toni@epa.gov> Subject: FW: PFOA

From: drupal_admin@epa.govOn Behalf OfShanen via EPA

Sent: Thursday, February 9, 2017 10:12:06 PM (UTC-05:00) Eastern Time (US & Canada)

To: Boswell, Karen Subject: PFOA

Submitted on 02/09/2017 10:12PM

Submitted values are:

Name: Shanen Subject: PFOA

Email: sgivone@yahoo.com

Comments: TCE is a very harmful chemical. It was released in Joplin, MO at the FAG Bearing plant. Many were prevented from using their wells, being hooked up to city water to prevent further illnesses. However, the lack of follow up through the EPA, ATSDR and MDNR may explain the birth defects (especially

those born with heart deformities, with an emphasis on septal defects...) being 2.5 times higher than the national average, here in Joplin.

Vapor Intrusion is likely...The EPA's Carol Browner and Dennis Grams were removed from their positions by a judge, here in Missouri, for NOT doing their job (In 1999 or 2000), and the new leaders of the EPA were

given until

2009 to FINALLY list the impaired waters of Missouri. (So many were on the 303d impaired water lists, When completed, as to be unbelievable.) I have no confidence in the EPA, MDNR or ATSDR for all of the bureaucratic BS that 'drives' all of you. You do not use science or integrity in your positions 'meant' to protect human health, but rather, turn a blind eye to those killing us or maiming our new born babies. I object to any 'leniency' in the use of TCE. It should be banned completely. My daughter and her 2 undeveloped siblings (hydatidiform moles) are all deceased. You have all failed us. When Trump suggests getting rid of the EPA, it saddens me, because I'm sure some of you are truly serious about your job and have personal ethics and religious beliefs guiding you...but for those EPA personnel found in region 7, I have not seen these traits. Please ban TCE from use since corporations cannot be responsible, EPA will not properly trace to where the contaminants migrated, and passing the buck to the MDNR is, to us, 'worthless'. If Oklahoma's attorney general Scott Pruitt gets the job and de-regulates the EPA...well, 'congratulations', you can continue to get paid for doing 'nothing', again.....If, however, new people working for the EPA are serious about protecting human health and the environment, we need a THOROUGH environmental investigation in Jasper and Newton County, Missouri, to stop the INCREASING rates of birth defects, cancer and early death and disability found here. There are many potential harms, but TCE is one of them. Only SCIENCE and INTEGRITY will discover these issues, however. Have you got 'that'? Web Area: Assessing and Managing Chemicals under TSCA

Krasnic, Toni [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From:

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F94B31DB1DBA47189537584F7F0AAACC-TKRASNIC]

Sent: 2/15/2017 2:46:30 PM

Wolf, Joel [Wolf.Joel@epa.gov] To:

Subject: RE: TCE

Attachments: Shanen_TCE_2017-02-15.docx

Hi Joel,

Attached please find a draft response.

Thanks,

Toni Krasnic Existing Chemicals Branch EPA/OCSPP/OPPT/CCD/ECB WJC East, 4134D | (202) 564-0984

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Joel Wolf

Chief, Existing Chemicals Branch

OCSPP/OPPT/CCD

US Environmental Protection Agency

WJC East, Room 4121A 202.564.0432, wolf.joel@epa.gov

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